

Olin - Spoliver

TXD000607028

A REPORT ON THE ASSESSMENT OF
SOIL CONTAMINATION IN OLIN SITE

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TXD000607028

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See 60RC Ltr to Womble, Novbr-17-1983.
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1 INTRODUCTION

2 This report presents the assessment of soil contamination in the
3 Olin Company facility at 7621 Wallisville Road, Houston, Texas as of
4 June, 1982. The report describes the methods and materials used to
5 provide unbiased data sources upon which the assessment was based.

6 The assessment utilizes 3 data sources: (1) the chemical analysis
7 of soil samples taken at the Olin site and check sites, (2) a SYMAP
8 projection of the concentration - areal distribution of specific soil
9 toxicant over the Olin and check sites, and (3) the estimated concen-
10 tration of soil toxicants in soil solution based on equilibrium con-
11 stants of the toxicants and their concentrations in the soil samples.

12 The following individuals and organization contributed their
13 talents and resources to this project:

- 14 1. Dr. Eugene Brams, soil scientist, principal con-
15 sultant and coordinator of the project - Pollution
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25 Houston, Texas 77025
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4 from concentration value of soil samples exceeding 1 ppm DDT
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- [J.L.T. (6C-H) Dec83] -

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Section I - Acquisition of soil samples

1.1 Soil sampling plan - A soil sampling plan designates in an unbiased and random manner which units (soil samples) of the population (soil in Olin and check sites) are taken as representative of that population. The plan employed in the Olin site survey was a systematic sample plan involving a random sampling of soil from selected units spaced at regular distances along 2 dimensions in a grid design where the intersection of the grid lines identify the unit locations.⁽¹⁾ (see map of Olin site, Figure 1). This design provided an unbiased, efficient and rigorous sampling of the site at minimum cost.⁽¹⁾ Because greater soil contamination was suspected in the northern portion of the site, the sample locations were spaced closer providing more observations per unit area than the southern part where less soil adulteration was suspected. Included in the systematic plan were 2 judgement samples⁽¹⁾ to measure toxicant load in soil of areas surmised as waste dump areas.⁽⁴⁾

Two check sites were located in a residential area approximately 2000 M from the Olin site within an environment similar to the Olin site with respect to industrial activity, particulate fallout and/or aerosol dispersants, and soil series (Lake Charles Clay)⁽⁵⁾ Fig. 2. The latter parameter is particularly important because soil properties profoundly influence the retention of organic toxicants. The check sites were uninhabited, thickly weeded, residential lots which apparently had not been used for gardening, recreation, or as a homestead since the area was settled (since 1940). The sample locations in the check site were judgement samples sited in an area of level terrain and typical

1 soil (Lake Charles) profile based on a preliminary examination.

2 The number of sample units (N) over the Olin site was estimated
3 from the relationship, $N=4 s^2/L^2$ where s^2 is the population variance,
4 L^2 is an acceptable variance selected for our survey, and N is the
5 number of samples.⁽²⁾ From a preliminary report by EPA concerning
6 soil contamination at the Olin site⁽³⁾, it was determined that only 12
7 samples of soil were analysed for DDT. The mean concentration of DDT
8 was 4357 ppm with a standard deviation of 1000 ppm. Since these were
9 the only data available for the 12 samples, they were utilized as the
10 values measuring the DDT distribution in the population (The Olin Site).
11 For our study we assigned a limit of 500 ppm as a generic standard de-
12 viation for the toxicants we were to measure ($500^2=L^2$). Substituting
13 these values into the above equation provided a benchmark N of 16-20
14 samples for the site. Therefore, for this survey, 23 random soil
15 samples locations were assigned to the Olin site including the judge-
16 ment samples and 2 samples to the check sites, 1 sample from each of
17 the 2 check sites (Fig. 2).

18 (1) Peterson, R.G. and Calvin, Z.D. 1976. Sampling, In
19 Methods of Analysis. Part I. No. 9 Agronomy Series.
20 American Society of Agronomy, Madison, Wis., U.S.A.

21 (2) Snedacor, G.W. and Cackran, W.C., 1982. Statistical
22 Methods 7th Edition, Iowa State University Press,
23 Ames, Iowa, U.S.A.

24 (3) E.P.A. January 19, 1981. Code PVL. Letter to S. Pacific
25 Transportation Company c/o Mr. H.B. La Tourettee, General
26 Attorney, 913 Franklin Ave., Houston, Texas 77002
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1 (4) E.P.A., 1982. Photographic Analysis of the Olin Hazardous
2 Waste Site on Wallisville Road, Houston, Texas pp. 11-14.

3 (5) Soil survey of Harris County and Harris County Flood Control
4 District, U.S.D.A. and Soil Conservation Survey, Temple,
5 Texas.

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1 Section 1.2 - Soil sample core collection and sample preparation -
2 methods and materials

3 Preparation

4 The sample sites were located using the N. E. corner fence post as
5 the base point, measuring along the E. fence to the S. E. corner of the
6 property with a flexible steel tape to fix the location of the grid
7 lines according to the design shown on the chart (Fig. 1). The grid
8 lines were delineated in the field by affixing bright colored plastic
9 flag strips to the E. fence. The same procedure was followed along the
10 W. fence beginning at the junction of the W. and N. fences moving to
11 the S. W. end of the property. The intermediate sample points along the
12 respective grid lines were located by measuring the prescribed distances
13 along the grid lines using the plastic flag marker on the W. and E.
14 fences to align the intermediate sites which were then marked by red-
15 ribboned nails struck into the asphalt-concrete surface.

16 A truck-mounted hydraulic screw auger (4" diameter) and shelby-
17 tube core sampler 3" diameter-24" long housing (Soil Engineering, Inc.)
18 was driven to the respective sample sites to obtain the soil core
19 samples. The steel screw auger was used to penetrate the asphalt-
20 concrete paved surface and the overburden (fill). The fill was piled
21 away from the auger hole and excess material cleaned from the boring
22 by hand (using rubber-composition gloves). When the soil surface was
23 reached, the auger was removed and the shelby-tube attached to the
24 hydraulic press. The corer was pushed to a depth of 24 inches, lifted
25 from the hole and the soil core removed from the tube by means of a
26 pressure piston rod. The soil core was cut crossectionally with a
27 steel knife into 2 parts and the fresh surfaces immediately examined

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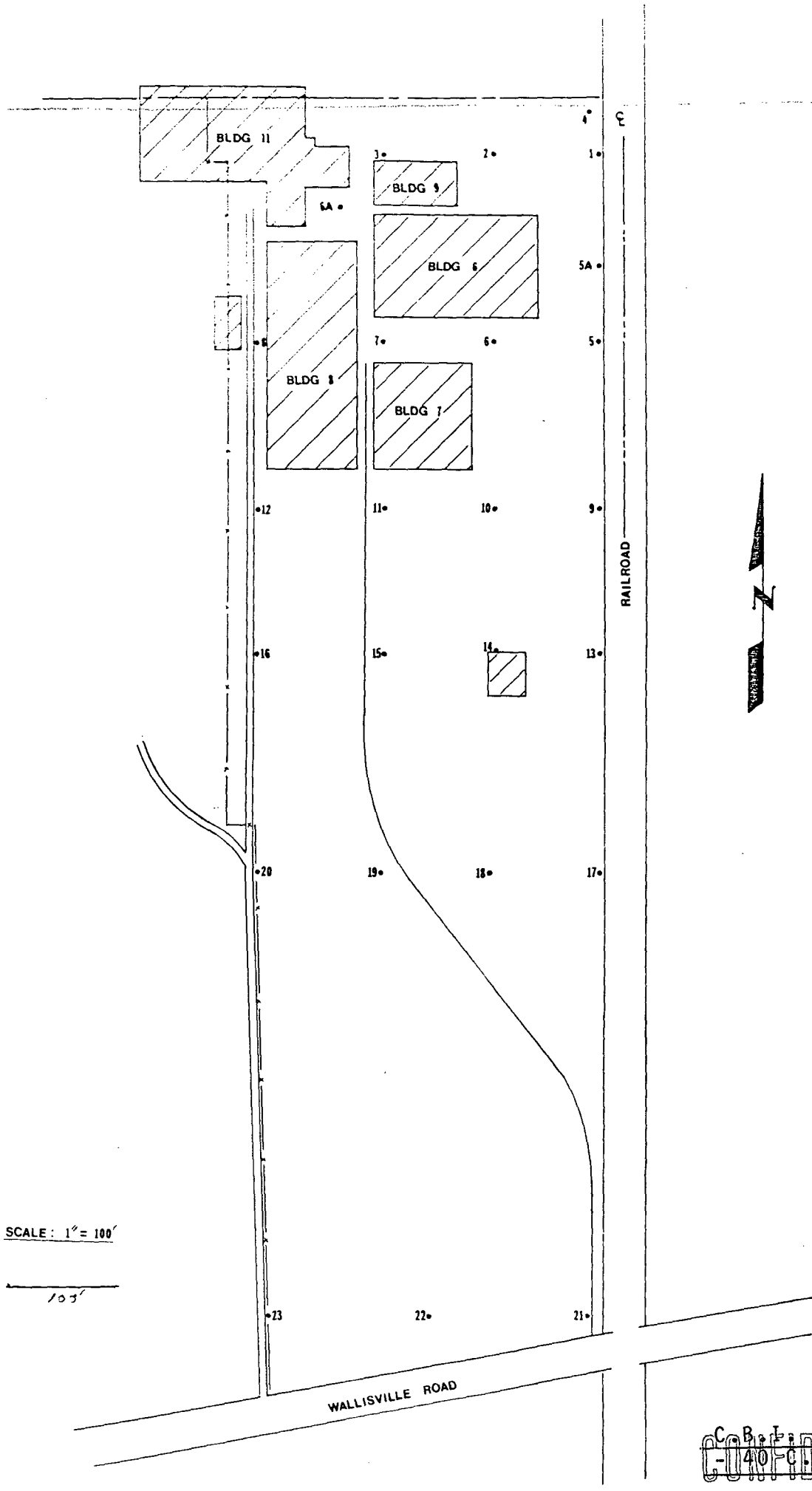
1 for the following parameters: color, texture, odor, presence of foreign
2 material (debris), soil type and horizon differentiation. An estimation
3 of soil moisture was also made. The shelby-tube was cleaned by wiping
4 the inside surface with a clean cloth and a second, deeper soil core
5 was taken from 24" to 48" depth and examined as described above. The
6 auger and corer were wiped clean before the next site was sampled. Each
7 core was wrapped in aluminum foil to preserve moisture and volatile
8 agents. The wrapped core was placed into a plastic zip bag, labeled
9 as to site, depth, date, and name of investigator and placed in a card-
10 board container under a canopy in the rear of a pick-up vehicle. The
11 samples were transported that day to a deep freeze holder at College
12 Station, Texas. The surfaces of the soil cores were not scraped or re-
13 moved in the field. We felt that this would induce contamination.
14 Instead, the cores were prepared in the laboratory by W. K. Brown Assoc.
15 and packed into sterile glass jars prior to sending them to the analy-
16 tical laboratory.

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SCALE: 1" = 100'

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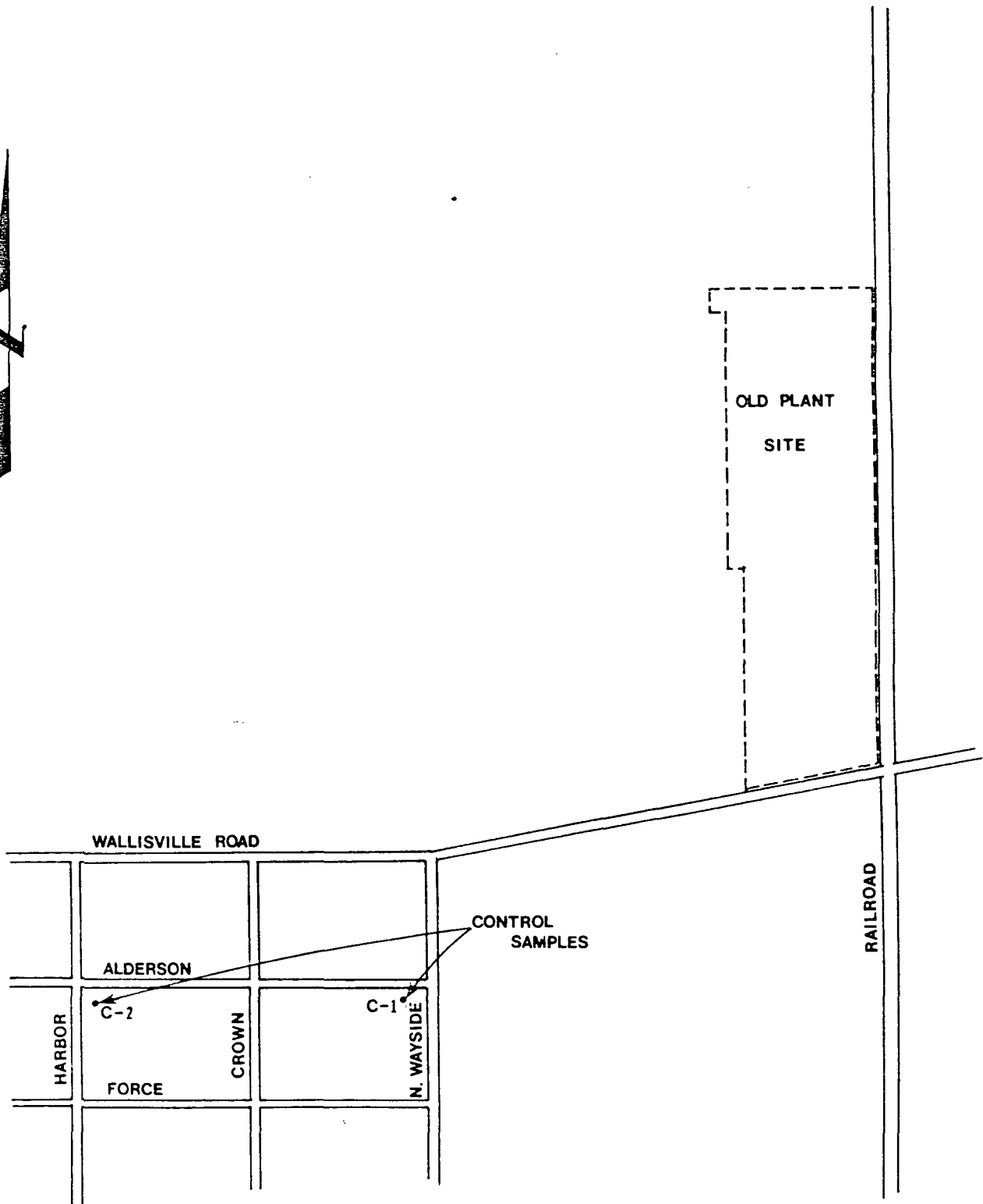


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1 Section 1.3 - Field description of soil sample cores

2 Descriptions of the fresh soil sample cores were made at the Olin
3 and check sites for the following parameters:

- 4 1. Color
5 2. Soil series
6 3. Horizon differentiation
7 4. Odor
8 5. Texture
9 6. Debris

10 The description of the cores are given in Table 1 and delineated
11 on the map of the Olin and check sites in Figure 1 and 2. Sample site
12 is identified in the Table and map by the appropriate number. Soil
13 depth is designated in the Table as (1) a sample core taken just under
14 the fill to a depth of 24" (60 cm) or shallow depth. The number (2)
15 identifies a sample core taken from 24" to 48" (120 cm) or deep depth.

16 Table 1 - Field descriptions of soil sample cores

17 Sample

18 <u>site</u>	<u>depth</u>	<u>description</u>
19 1	1	0"-15" fill, sand, gravel, 15"-24" core, 20 grey blk., poor horizon, sulfur granules, 21 Lake Charles Series. (L.C.)
22	2	24"-40" grey blk, much debris, shell slight 23 to strong odor, L. C., clay, shell mix.
24 2	1	0"-18" fill, black powder, shell, L. C., 25 poor hor. strong odor, 18"-24" core sample 26 L. C., glass mix, clay, sulfur particles, 27 shell, glass, strong odor, no hor., some clay.

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1	sample site	depth	description
2		2	24"-218" much debris, no hor., very strong
3			odor, clay grey blk, shell.
4		3	48"-60" L. C. strong odor, much debris, fair
5			hor., clay.
6		4	60"-84", L. C. good hor. some debris, sl.
7			odor, clay.
8	3	1	0"-19" fill, 19"-24" core, lime fill, sulfur
9			granules, strong odor, poor hor.
10		2	24"-28" lime, sulfur streak, sl. odor, fair
11			hor.
12	4	1	0"-16" fill, gravel, 16"-24" core, L. C.
13			some debris, sulfur granules, strong odor,
14			fair hor.
15		2	24"-48", lime granules, clay, slight odoe,
16			grey black, fair to good hor.
17	5	1	0"-12" fill, lime, sand, stone; 12"-24"
18			sample, grey bl. some debris, L. C. slight
19			(sl.) odor, clay.
20		2	24"-48" gr. bl. L. C. poor horizon (hor.),
21			much debris, strong odor, clay, rock.
22	6	1	0"-7" fill, sand, clay, shell: 7"-30" debris,
23			foundation brick red, 30"-40" core sample,
24			grey, black (gr. bl.) Lake Charles (L.C.),
25			debris, strong odor, clay.
26		2	48"-60" grey black (grey bl.), L. C. normal
27			horizon, little debris, no odor, clay.
	7	1	0"-12" fill, 12"-24" poor hor., L.C.
			mostly debris, no odor. Dark gr.
		2	24"-48" much debris, poor hor., very sl.
			odor, L. C. clay.

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sample site	depth	description
8	1	0"-12" fill, lime, stone, 12"-24" debris, orange color, sulfur particles, no odor.
	2	24"-48" poor hor., debris mixed clay, slight odor, L. C. gr. bl.
9	1	0"-17" fill, strong odor from core hole, 17"-24" sulfur granules, some mottles, no odor of sample.
	2	24"-48" no debris, good hor. L. C. grey bl. no odor, clay.
10	1	0"-20" fill, 20"-36", poor hor., clay, L. C. some debris, sulfur granules, strong odor. Light gr.
	2	36"-48", some debris, L. C. strong odor clay, rock mix.
11	1	0"-22" fill, 22"-36" L. C. sulfur streaks, sl. odor, blk, debris.
	2	36"-48" no odor, L. C. blue-blk color.
12	1	0"-22" fill, 22"-36" poor hor., debris, sulfur particles slight-strong odor, L. C. clay.
	2	36"-48", L. C. clay, no odor, good hor.
13	1	0"-15" fill, assorted materials, 15"-24" strong odor, L. C. clay, grey bl. some mottles.
	2	24"-48", L. C. mottles, slight odor.
14	1	0"-18" fill, 18"-24" core sample, poor hor. debris, black color, grit strong odor.
	2	24"-48" poor hor., clay debris is clay,

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1	sample site	depth	description
2			mix, black grit soot-like, slight odor.
3			
4	15	1	0"-36" deep fill, clay, rock, lime, shell.
5	site is highest level of area		no hor. possible ditch site or railsite.
6		2	36"-44", no odor, no hor., debris, clay mix.
7		3	44"-56" some debris, L. C. grey bl., no odor to sl. odor.
8			
9	16	1	0"-12" fill, 12"-24" sample core, light grey bl. slight odor, clay.
10		2	24"-48" debris, gravel, shell, L. C. sl. odor.
11			
12	17	1	0"-10" fill, 10"-24", L. C. slight odor, small debris, grey bl. clay.
13		2	24"-48", L. C. clay, no debris, slight odor.
14			
15	18	1	0"-11" fill, sand black grit, 11"-24" core black, gritty, poor hor. slight odor.
16		2	24"-48", poor hor. glassy, gritty material black no odor, L. C.
17			
18	19	1	0"-24" fill, 24"-48" core sample, debris, grit, shell, poor hor. L. C. much stone, and organic matter, slight odor; Little clay.
19		2	48"-72", L. C. good hor. clay, grey bl., slight odor.
20			
21	20	1	0"-11" fill, 11"-24" sample core, L. C., no odor, clay sand mix.
22		2	24"-48", L. C. some debris, gravel, slight odor, clay.
23			
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1	<u>sample site</u>	<u>depth</u>	<u>description</u>
2	21	1	0"-16" fill, 16"-024" core sample, L. C.
3			good hor. no debris, no odor, some lime
4			streaks, clay.
5		2	24"-48", L. C. good hor. no debris, no odor,
6			clay.
7	22	1	0"-12" fill, 12"-24" sample L. C., some lime;
8			clay, no odor, good hor.
9		2	24"-48", L. C. grey bl., no odor, clay, nor
10			debris.
11	23	1	0"-10" fill, sand, gravel, 10"-24", L. C.
12			grey bl. no debris, clay, no odor.
13		2	24"-48", L. C. good hor., no odor, gr. bl,
14			clay.
15	5A	1	0"-12" fill, 12"-24" very strong odor. L. C.
16			poor hor. much debris, sulfur streaks.
17		2	24"-48" very strong odor, L. C. very bl.
18			No debris, fair hor.
19	6A	1	0"-18" fill, 18"-24" L. C., poor hor. debris-
20			strong odor grey bl., clay, shell.
21		2	24"-48" L. C. little debris, grey bl. clay,
22			strong odor.
23	<u>Check site</u>	<u>depth</u>	<u>description</u>
24	C1	1	0" fill, 9"-24", core, L. C., typical hor.,
25			no debris, earthy, fresh odor, grey bl., clay.
26		2	24"-48", L. C. fresh earthy odor, clay no
27			mottling. Site on lot, corner of E. Wallis-
			field and Exchange, 500 ft. S. on Exchange.

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1	<u>Check site</u>	<u>depth</u>	<u>description</u>
2	C2	1	0" fill, 8"-24", L. C., some stone, no odor,
3			clay gr. bl., typical hor.
4		2	24"-48" L. C., no debris, excellent hor.
5			clay, earthy, fresh odor. Site on lot,
6			corner of Harbor and Aldson.
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23			C.B.I. CLAIM WAS WAIVED
24			- 40 C.F.R. §2.205(d)(1) -
25			- [J.L.T. (6C-H) Dec 82] -
26			= = = = =
27			

 [Signature]

1 Section 2 - CORE HANDLING AND SUBSAMPLE PROCEDURES - This part of
2 Section 2 of this report written and submitted by K.W.
3 Brown and Associates, Inc., 707 Texas Avenue S., Suite
4 202D, College Station, Texas 77801

5 2.1 Introduction and Objectives

6 Personnel at K. W. Brown and Associates, Inc. (KWB) were contacted
7 on May 27, 1982, by Dr. Eugene Brams of Pollution Assessors regarding
8 a former industrial site which was potentially polluted with residues
9 from the formulation of chlorinated pesticides. KWB agreed to assist
10 in a sampling program at the site to assess the degree of pollution,
11 if any, of soils and surface fill and debris. Preliminary actions in-
12 cluded a visit to the site by Mr. Gordon Evans of KWB, the project
13 supervisor, discussions with Dr. Brams concerning sampling strategy,
14 and acquisition and review of historic data (i.e. sample analyses and
15 aerial photos). A sampling plan specifying sample locations was
16 developed by Dr. Brams in consultation with Mr. Evans, and KWB scheduled
17 a contractor to provide the soil coring equipment and technicians.
18 Mr. Evans arrived at the site a second time on June 21, and assisted
19 Dr. Brams and the soil coring contractor in obtaining samples from the
20 locations designated in the sampling plan. The following is a descrip-
21 tion of procedures employed by KWB in packaging, transporting, sub-
22 sampling and delivering the soil core samples.

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1 2.2 Chain of Custody Procedures

2 A sample security, identification and tracking system was used to
3 assure positive sample identification and to prevent knowing or unknow-
4 ing tampering by outside parties. In the field, sample bags were each
5 assigned a sample code number using an indelible marker. Two seals
6 were then placed on each "zip-lock" sample bag such that samples could
7 not be removed without breaking one or both seals. A chain-of-custody
8 form (sample form attached) was completed and signed by Mr. Evans, and
9 all samples remained in his custody until they were relinquished to
10 the Texas A & M University Chemistry Department laboratory for analysis.

11 2.3 Sample Transportation and Storage

12 After packaging core samples in the field, boxes containing the
13 sample bags were immediately transported by truck to College Station,
14 Texas. During sampling and transport, core samples remained at am-
15 bient temperatures, approximately 30°C. Sampling time was approximate-
16 ly seven hours while transport to College Station required two hours.
17 Minimal losses of the compounds of concern would occur at this ambient
18 temperature in such a short duration since these compounds are persis-
19 tent in the environment, with compound half-lives in soil on the order
20 of months or years. Upon arrival at KWB facilities, the samples were
21 placed in cold storage at less than 0°C while awaiting subsampling.

22 2.4 Subsampling Protocol

23 Preparation of samples before delivery to the laboratory was
24 necessary to avoid cross-contamination of samples as well as to provide
25 a practically manageable quantity for analysis. Subsampling also pro-
26 vided a practically manageable quantity for analysis. Subsampling also
27 provided material reserves in the event that additional testing was to

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1 be needed or if the laboratory's samples were lost or damaged. The
2 subsampling protocol was as follows:

- 3 (1) Samples were removed from cold storage and carried to
4 KWB laboratories for preparation
- 5 (2) Work table was cleaned and covered with a layer of heavy-
6 duty aluminum foil to provide a clean working surface
- 7 (3) Technicians were outfitted with rubber gloves for personal
8 safety
- 9 (4) Sample bags were arranged in order from least to most con-
10 taminated, as judged by Mr. Evans based on field observations
11 and aerial photo interpretations
- 12 (5) Bags were opened only as needed to prevent accidental in-
13 termingling which could result in erroneous sample labeling
- 14 (6) Likewise, subsample jars were labeled only as needed
- 15 (7) As each core was removed from its bag, the aluminum foil
16 wrap was unrolled from the core and spread to provide an
17 individual work surface (if cores were handled directly on
18 the table, sample cross-contamination could occur)
- 19 (8) The exterior of the cores were trimmed, exposing the interior
20 portion which had not contacted the metal shelby tube used
21 in the field to obtain the samples (see Figure 1). Stainless
22 steel knives were used to trim and subsample. These knives
23 were prewashed in tap water followed by rinsing in chromato-
24 graphic grade acetone (acetone, an organic solvent, dissolves
25 and removes traces of the organic chemicals of concern).
26 One of two methods of trimming was used (Figure 1a or b)
27 dependent on the texture of the given core. Plastic, clayey

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1 cores were trimmed by method "a", while hard crumbly cores
2 or those containing large debris were trimmed by method "b".

3 (9) Subsamples consisted of lengthwise slices or wedges of pre-
4 trimmed cores to provide a proportional sample from the
5 entire core length (see Figure 2). Method "a" or "b" was
6 used for each core which had been pretrimmed according to
7 method "a" or "b" in Figure 1, respectively. A subsample
8 of about 250 grams mass was separated out of each approxi-
9 mately 2000 gram core.

10 (10) Subsamples were placed in prewashed and labeled screw-cap
11 glass jars which were supplied by the TAMU chemistry labora-
12 tory doing the analysis. Aluminum foil cap liners were
13 placed over the jar mouth before the caps were placed on
14 the jars.

15 (11) After subsampling, the remaining core material was re-
16 packaged in the original foil wrap and zip-lock bags.

17 (12) Subsampling was begun on the afternoon of 23 June 1982
18 and finished during the afternoon of 24 June. All samples
19 and subsamples were kept in secure cold storage during
20 the night of June 23, until resumption of work.

21 On the afternoon of 24 June, all samples and subsamples were
22 transported by Mr. Evans to the TAMU chemistry laboratory. There he
23 was met by Dr. Elliott Atlas, chemist in charge of analysis, and all
24 materials were placed in cold storage. Mr. Evans then dated and
25 initialed the chain-of-custody form and relinquished possession to
26 Dr. Atlas, who in turn signed and dated the chain-of-custody form.

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CHAIN OF CUSTODY RECORD

Sample Source (Company) _____

Sampler _____

Witness _____

Dates _____

Sample Type _____

Sample Numbers _____

Preservation Method _____

Analysis Required _____

Recipients:

	<u>Company</u>	<u>Signature</u>	<u>Date Received</u>	<u>Date Released</u>	<u>Initials (Release)</u>
1)	_____	_____	_____	_____	_____
2)	_____	_____	_____	_____	_____
3)	_____	_____	_____	_____	_____
4)	_____	_____	_____	_____	_____
5)	_____	_____	_____	_____	_____
6)	_____	_____	_____	_____	_____
7)	_____	_____	_____	_____	_____
8)	_____	_____	_____	_____	_____
9)	_____	_____	_____	_____	_____
10)	_____	_____	_____	_____	_____

C.B.I. CLAIM WAS WAIVED
 - 40 C.F.R. § 2.205 (a) (1)
 - [J.L.T. (66-H) Dec 82]

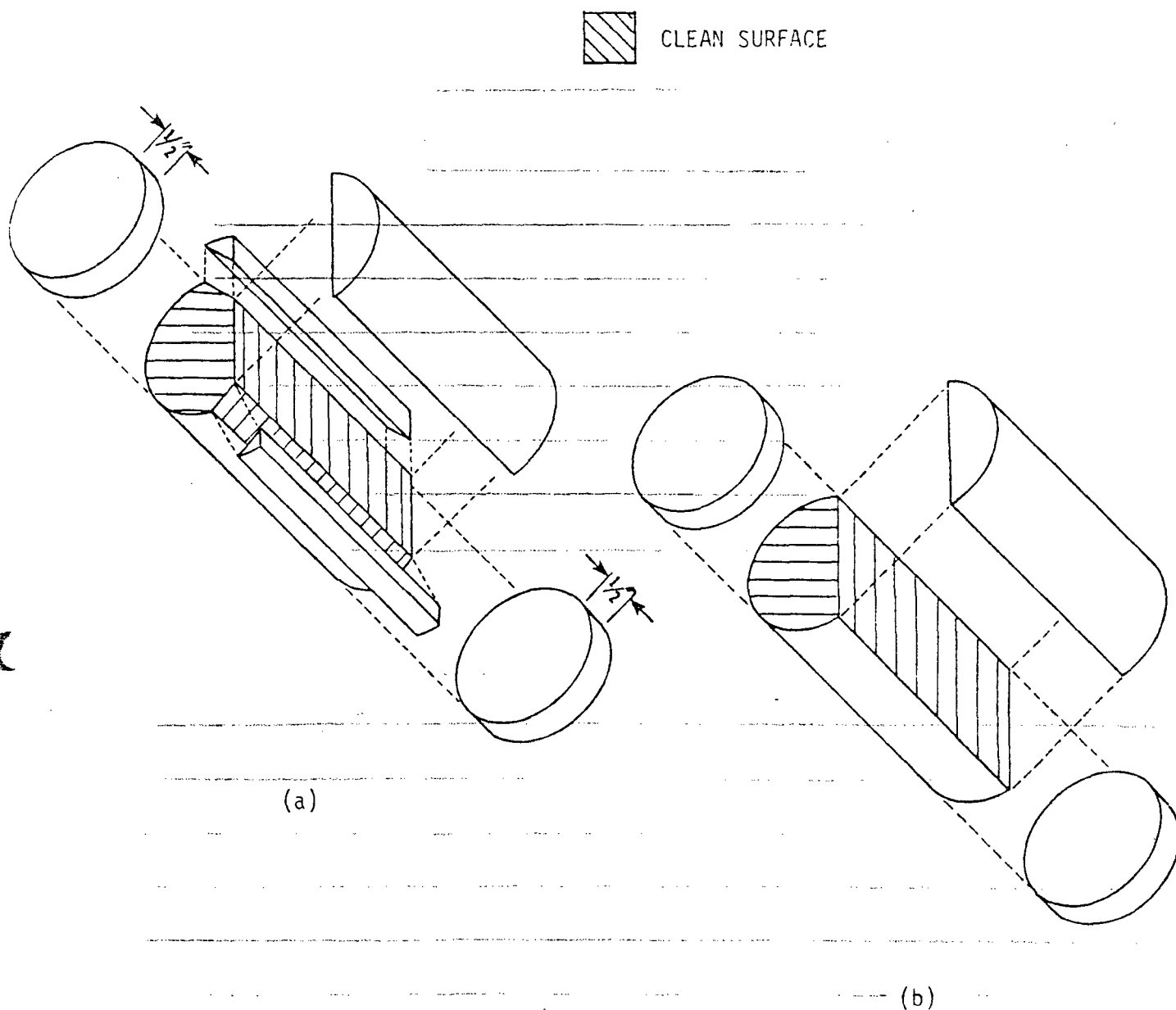


Figure 3 Methods used to trim core samples, (a) plastic, clayey cores and (b) hard, crumbly cores or those containing large debris or gravel.

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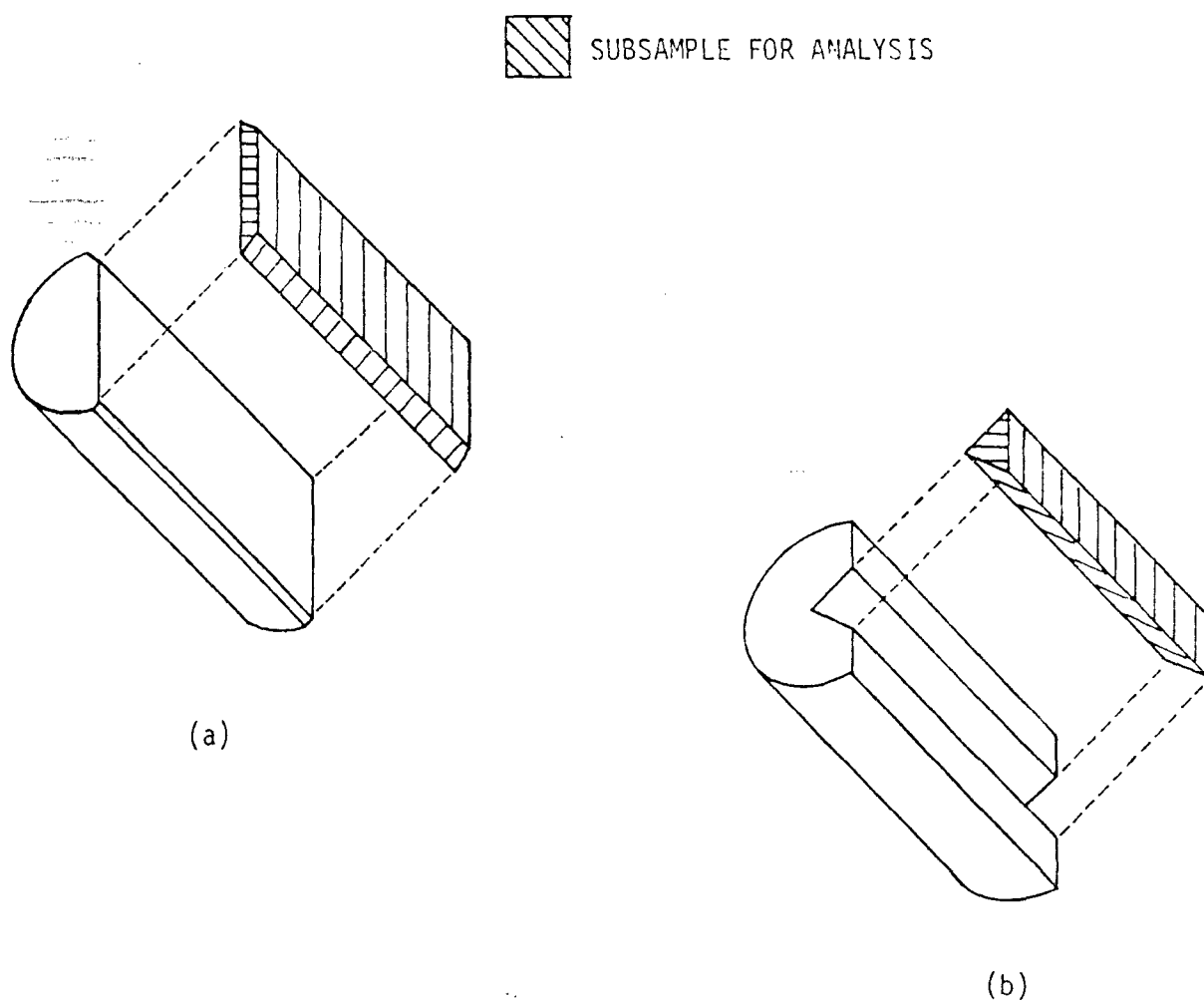


Figure 4 Methods used to subsample pretrimmed cores, (a) plastic, clayey cores and (b) hard, crumbly cores or those containing large debris or gravel.

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1 Section 3 - Chemical analysis of soil samples - from a report prepared
2 by Dr. E. Atlas in consultation with Dr. C. S. Giam, en-
3 vironmental Services, Dept. of Chemistry, Texas A & M
4 University, College Station, Texas 77843.

5 This report describes the results of chemical analyses of soil
6 samples from a site in Houston, Texas. The objective of the study was
7 to determine the concentration of selected chlorinated hydrocarbons
8 (e.g. pesticides) at the study site in Houston. Selected compounds in-
9 clude toxaphene and DDT (Figure 1), as well as HCB, HCH, chlordane and
10 PCB.

11 Details of the methodology are presented in the technical section
12 submitted in a separate report which is included in its entirety in the
13 Appendix. The report by the organic chemists is an independent apprai-
14 sal of soil contamination at the Olin site, known only to them as a
15 Houston site. This assessment requested by the coordinator (Dr. Eugene
16 Brams) and the attorney (Mr. Robert Maher) as substantative information
17 to the coordinator assessment of the soil contamination at the Olin
18 site. No other information was provided concerning the site other than
19 required in the chain of custody form (See Section 2.2).

20 Briefly, soil samples collected at the site were subsampled and
21 stored frozen until analysis. The organic compounds were extracted
22 from the soil using suitable organic solvents. Separation of the com-
23 plex mixture of compounds in the extract was carried out by absorption
24 chromatography followed by capillary gas chromatography (GC). Examples
25 of instrument (GC) responses to toxicants in soil extracts and standard
26 concentrations in solvent of select toxicants are shown in the following
27 representations of data printout recorder responses. In the printout,

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(Figures 5, 7, 8, 9, and 11) the sample of a typical soil extract is identified by the soil sample number in the upper left corner. Included is the dilution factor required to reduce the concentration of the select toxicant in the extract to levels within the detectable range of the instrument. Examples of select standard recorder responses are given in Figures 6, 8, and 10. The response peaks to the standard toxicant can be compared to the peaks found in the soil sample extracts and identifies the toxicant. The peak area is used to calculate the concentration of the soil toxicant.

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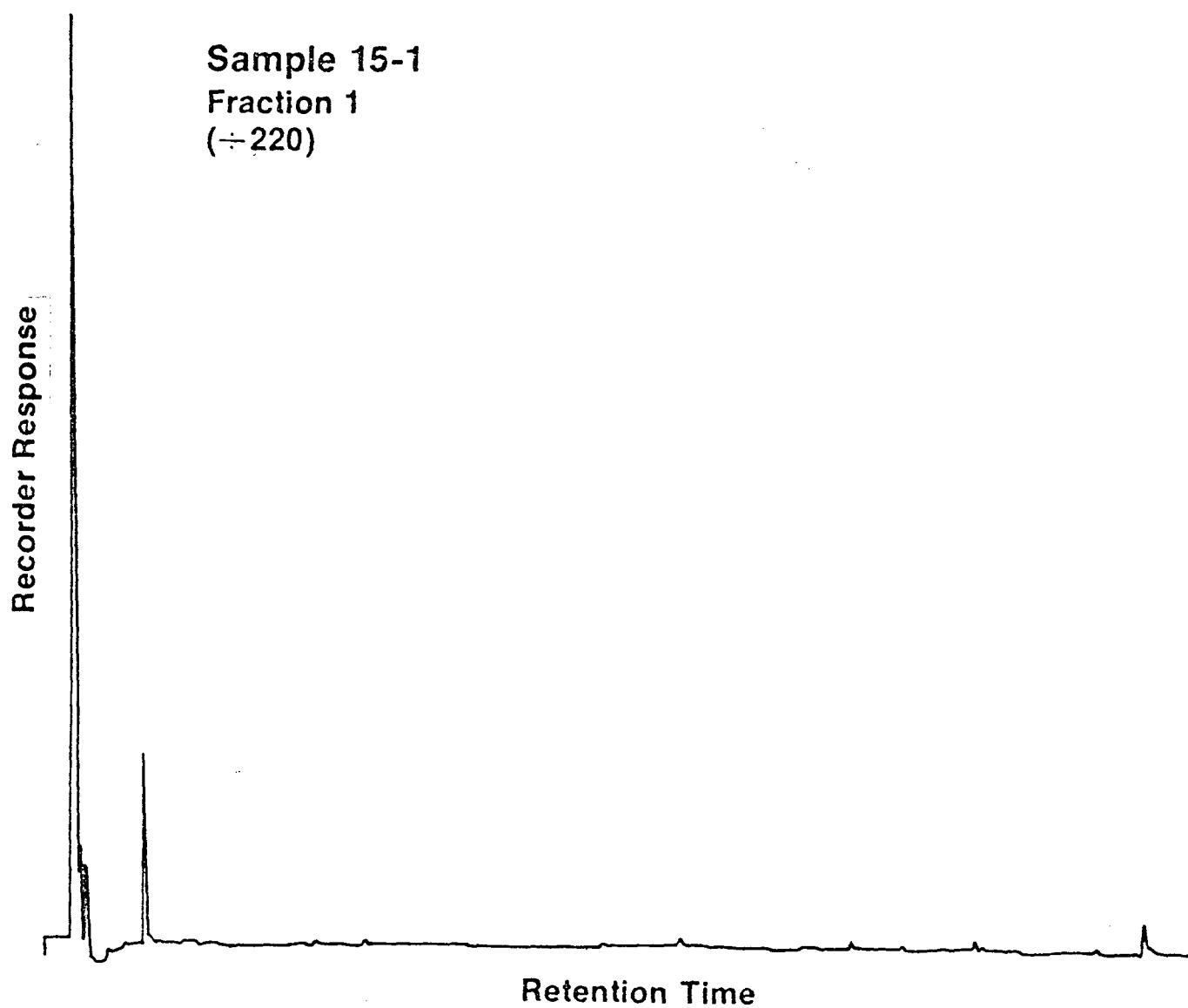


FIG. 5 GC COLUMN PRINT OF A TYPICAL SOIL SAMPLE EXTRACT
CONTAINING VERY LOW CONCENTRATION OF TOXICANT

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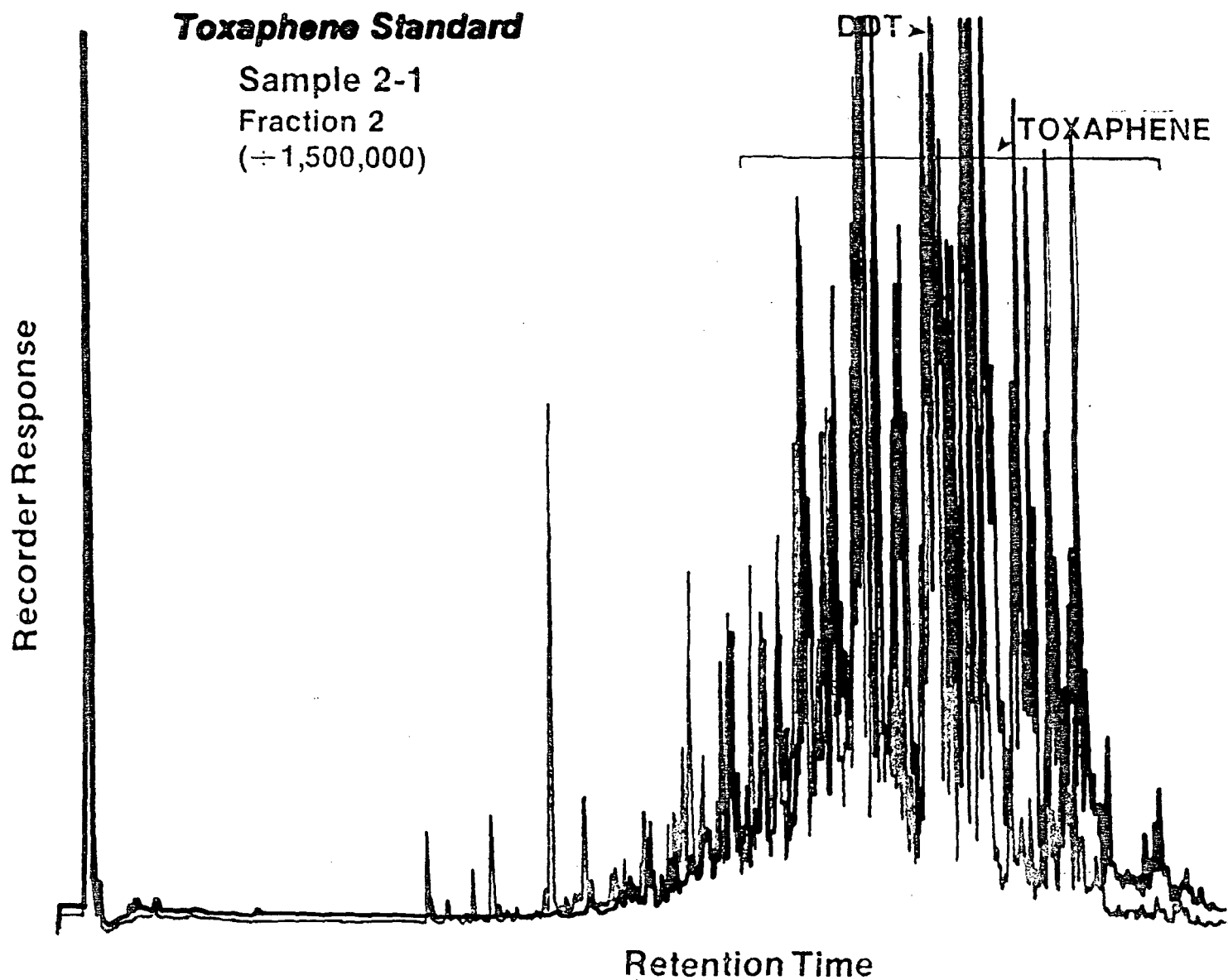


FIG. 7 GC COLUMN PRINT OF SOIL EXTRACT SHOWING TOXAPHENE AND DDT PEAKS
FIG. 6 GC COLUMN PRINT OF TOXAPHENE STANDARD

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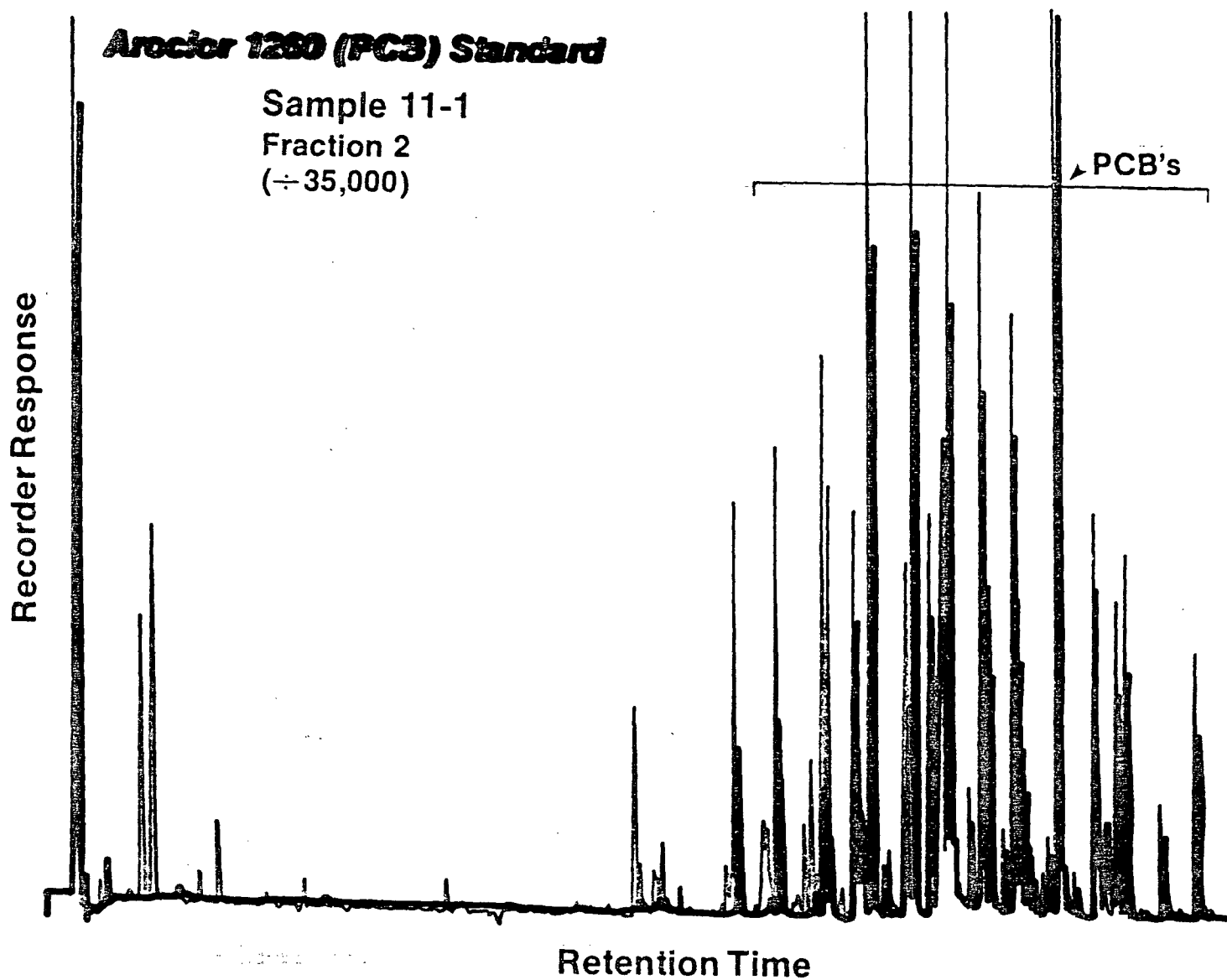


FIG. 9 GC COLUMN PRINT OF SOIL SAMPLES EXTRACT SHOWING PCB PEAKS

FIG. 8 GC COLUMN PRINT OF PCB STANDARD

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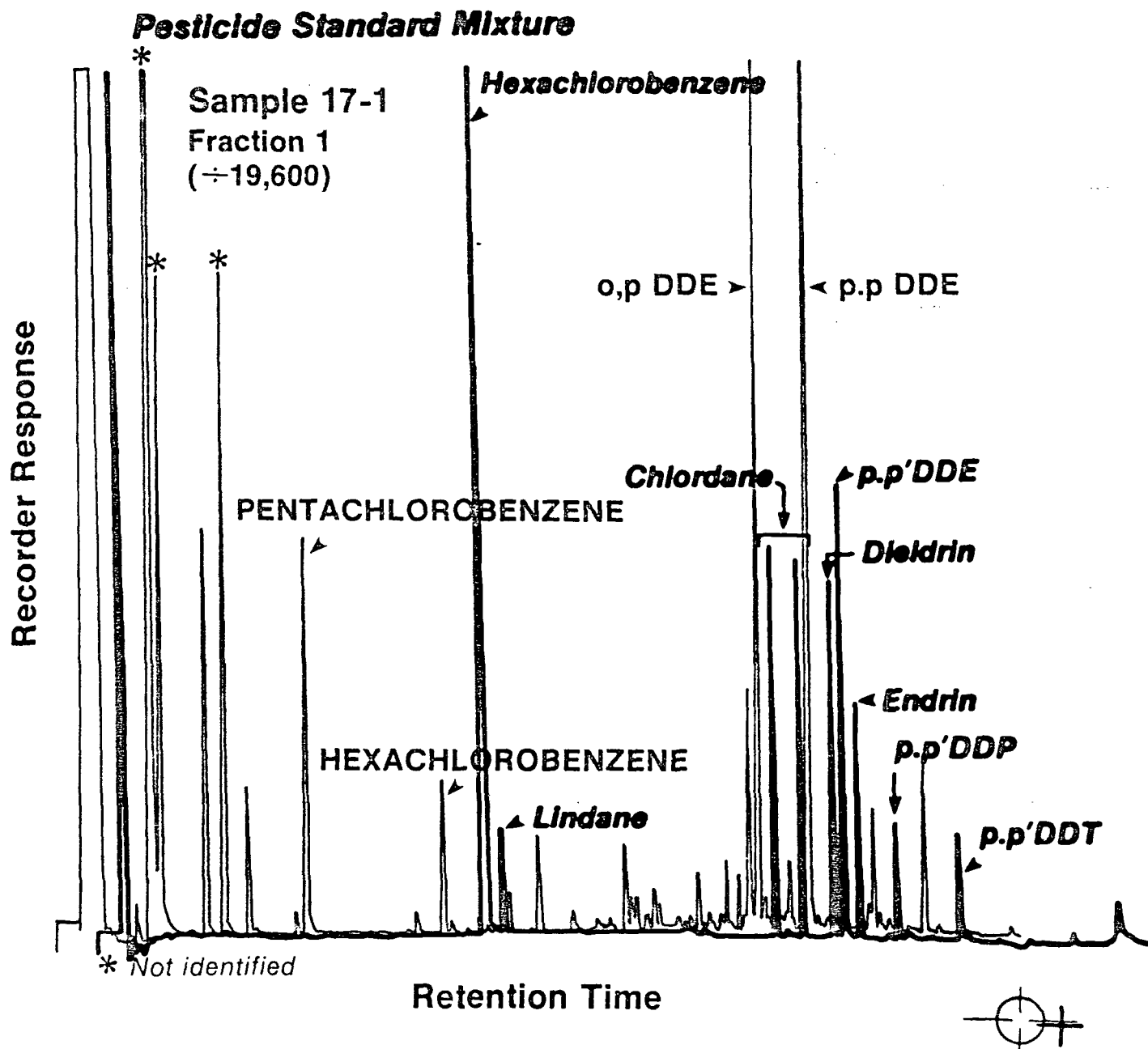


FIG. 10 GC COLUMN PRINT OF STANDARDS FOR SELECT TOXICANTS

FIG. 11 GC COLUMN PRINT OF SOIL SAMPLE EXTRACT SHOWING RESPONSES FOR
SELECT TOXICANTS

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Section 4 - Results of chemical analysis of soil samples

4.1 The concentrations of toxicants in respective soil samples are given in Tables 2, 3, 4, and 5. The first column in the tables identifies the number and location of the soil sample as delineated on the geographical maps of the Olin and check sites (Figures 1 and 2). The second number indicates the depth in the soil profile at which the sample was taken, where (1) indicates a composite sample taken from a core to a depth of 24 inches (30.5 cm) under the asphalt-concrete mantle and number (2) indicates a composite sample from a deep core sampled from 24 to 72 inches (183 cm) in the profile. The concentrations of the toxicants are given in the second column in micrograms per kilogram (ug/kg) or parts per billion (ppb) of air-dry soil. To assess the concentration of the respective toxicants in measures of micrograms per gram (ug/gsoil) or parts per million (ppm) divide the table values by 1000. The symbol (<) indicates values "less than" the stipulated value.

C.B.I. CLAIM WAS WAIVED
 - 40 C.F.R. §2.205(d)(1) -
 - [J.L.T. (6C-H) Dec 82] -
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9 Figure 1 - Map of the Olin site delineating soil sample
10 core location, pre-existing building and
11 structures and site borders.
12

13 Figure 2 - Map of check sites delineating geographical
14 reference to Olin site, residential lots
15 (sites of samples) and soil sample core
16 locations in lot site.
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Fig. 1

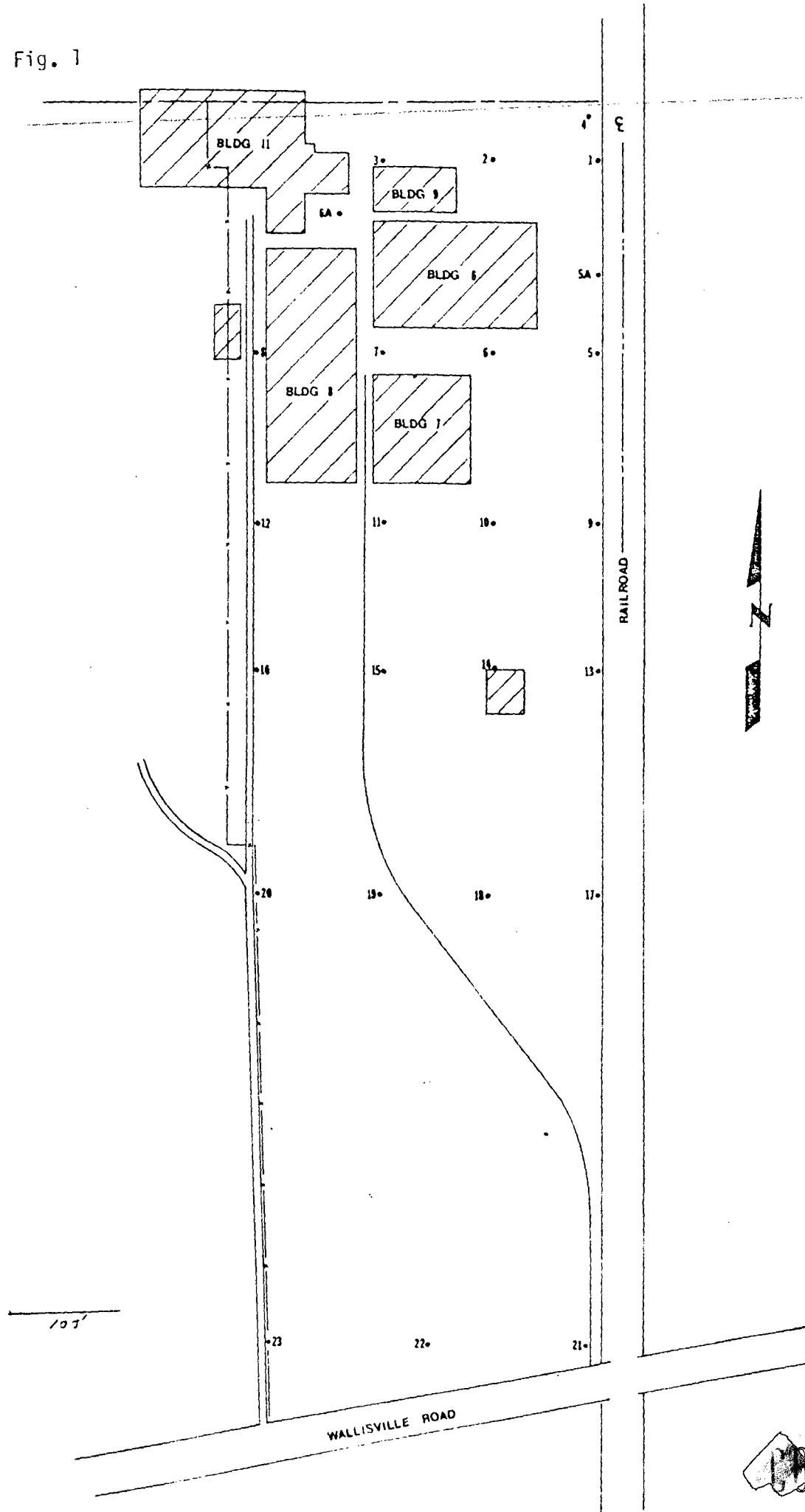


Fig. 2

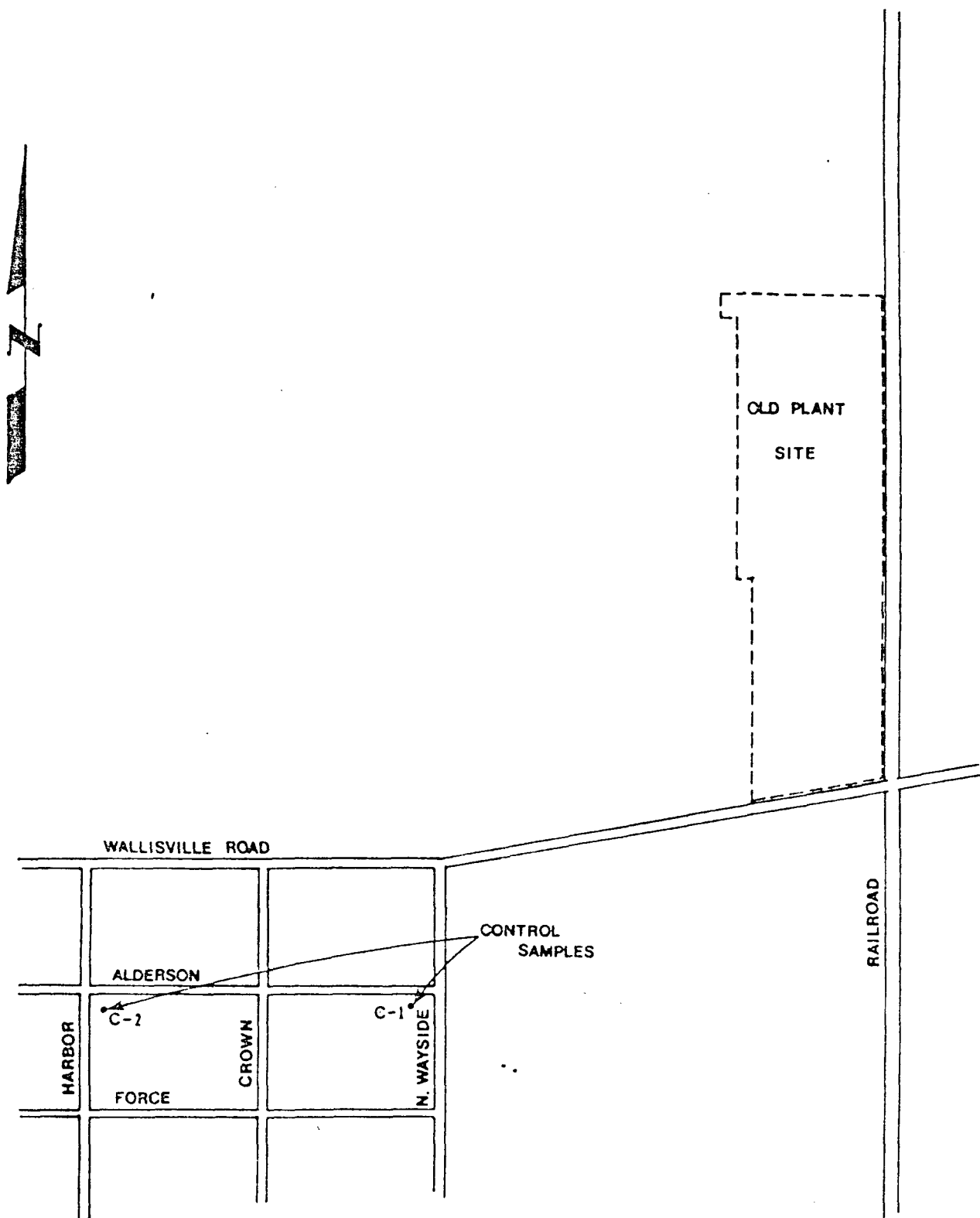
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Table 2

Toxaphene concentration (ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>Toxaphene Concentration</u>
1-1	1080
2-1	701000
3-1	421000
3-2	342000
4-1	<5
5-1	95
5A-1	<7
6-1	<4
6A-1	71100
7-1	126
8-1	<6
9-1	<5
10-1	7000
11-1	3110
12-1	<4
13-1	27000
14-1	<2
15-1	<5
16-1	<7
17-1	13400
18-1	1560
19-1	<4
20-1	<4
21-1	<4
22-1	40
23-1	7
C1-1	164
C2-1	156

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Table 3

Concentrations of DDT and metabolites (ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>DDE*</u>	<u>DDD*</u>	<u>DDT*</u>	<u>DDT**</u>
1-1	105	453	248	806
2-1	8000	11100	69800	88900
3-1	17200	36700	22600	76500
3-2	427	17100	15600	33100
4-1	<1	<1	12	12
5-1	<1	<1	35	35
5A-1	1	<1	7	8
6-1	55	40	14	109
6A-1	309	30400	3326	33762
7-1	488	173	39	700
8-1	3	<1	63	66
9-1	19	9	9	37
10-1	1500	3	13600	15100
11-1	1470	1686	616	3769
12-1	<3	<1	9	9
13-1	21300	5930	3470	30700
14-1	783	12200	5100	18100
15-1	<2	<1	10	10
16-1	7	4	34	45
17-1	7104	402	5960	13500
18-1	390	419	1080	1880
19-1	9	24	8	41
20-1	<1	<1	5	5
21-1	4	4	11	19
22-1	79	127	7	206
23-1	12	3	46	61
C1-1	2	<1	688	690
C2-1	126	<1	24	150

* includes both o,p and p,p' isomers

** DDT = DDE + DDD + DDT

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Table 4

Concentrations of selected chlorinated hydrocarbon insecticides (ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>Hexachlorocyclohexane</u>	<u>Chlordane</u>	<u>Dieldrin</u>
1-1	3230	122	18
2-1	11100	10800	4260
3-1	5600	10700	2190
3-2	4180	3041	2471
4-1	166	1	<1
5-1	6	<1	<1
5A-1	55	1	<1
6-1	<1	3	<1
6A-1	2440	10690	814
7-1	12	65	<1
8-1	82	<1	<1
9-1	32	1	<1
10-1	147	485	310
11-1	120	765	36
12-1	<2	<1	<1
13-1	641	2430	1080
14-1	<2	474	185
15-1	5	<1	<1
16-1	7520	<1	<1
17-1	361	633	490
18-1	5	215	22
19-1	<2	6	2
20-1	<2	<1	<1
21-1	<2	1	<1
22-1	<2	56	31
23-1	<2	18	10
C1-1	2	10	20
C2-1	<2	<1	<1

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Table 5

Concentration of chlorinated benzenes and chlorinated biphenyls (PCB)
(ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>Pentachlorobenzene</u>	<u>Hexachlorobenzene</u>	<u>PCB*</u>
1-1	8	63	1
2-1	2560	70500	10700
3-1	2930	12400	41300
3-2	--	1680	2080
4-1	<1	<1	27
5-1	<1	<1	<1
5A-1	<1	7	<2
6-1	<1	<1	<2
6A-1	8	81	175
7-1	<1	34	8490
8-1	<1	<1	<1
9-1	<1	<1	<1
10-1	20	86	51
11-1	20	43	16800
12-1	<1	<2	4
13-1	183	212	176
14-1	53	153	2870
15-1	<1	<1	<1
16-1	5	<1	273
17-1	64	79	393
18-1	4	13	174
19-1	<1	1	<1
20-1	<1	<1	5
21-1	<1	<1	<1
22-1	3	<3	1170
23-1	<1	5	20
C1-1	<1	4	7
C2-1	<1	<2	2580

*Calculated as the sum of Aroclor 1254 and Aroclor 1260.

1 4.2 Symap projection maps of concentration - areal distribution of
2 soil toxicants in Olin and check sites; Figures 12, 13, 14, 15,
3 16, 17, 18, 19, and 20.

4 Symap as used in this survey is a computer program which provides
5 a graphic assessment of the concentration - areal distribution of
6 specific toxicants over a designated geographical area⁽¹⁾, in this case
7 the Olin and check sites from discrete soil sample concentration and
8 location. The concentration range of the respective toxicants is
9 divided into discrete values which are uniformly distributed between
10 soil sample locations by isoline or contour lines. However, in this
11 study the concentration values are represented by raster symbols where
12 concentration are differentiated by grey-tone shading or hues within
13 small grids distributed over the area, an effect comparable to contour
14 lines. This treatment of discrete data points (the soil sample con-
15 centration and location) does not "smear" or average the data over the
16 area between sample location as for example a location having very
17 high toxicant levels (toxic waste disposal site) adjacent to several
18 low-level sites, but rather provides the best estimates of toxicant
19 concentrations in discrete values along the range of toxicant concen-
20 tration between the sample site of high concentration and the concen-
21 tration of the adjacent samples.

22 The Symap was prepared using 2,166 raster grids as shown by the
23 measurement marks along the X and Y axis encompassing the actual limits
24 of the Olin site (Figures 12-20). The concentration range for each
25 toxicant is divided into 9 discrete values represented by raster hues
26 labeled with value numbers.

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1 To quantitatively estimate the areal distribution of a respective
2 value number for a specific toxicant, simply divide the number of
3 occurrences by 2,166 to determine the proportion of the Olin site con-
4 taminated.

5 The check sites were allotted a total of 325 occurrences or 162 per
6 site. To conserve space the Symaps of the check sites were placed
7 within the extra space provided for the Olin site in each Symap pro-
8 jection. The check sites are represented by the 2 square areas in the
9 lower left hand corner of each Symap.

10 The concentration differential between value numbers (codes) 8
11 and 9 for the toxicants in Table 6 is 10 fold because the extreme range
12 of toxaphene was taken as a standard. However, for the calculations
13 used to generate the data for the assessment of DDT, PCB, pentachloro-
14 benzene and hexachlorobenzene a range of 50,000 - 100,000 ppb and a
15 mid point concentration of 75,000 ppb or 75 ppm was used in code 9.

16 To transfer a point or an area from either the Symap projection
17 and the area map, locate the area or point of interest by the inter-
18 secting grid marks on the X and Y axis and transfer the counts to the
19 other map.

- 20 1) James W. Cerny, 1972. Use of the Symap Computer Mapping
21 Program. J. of Geography 71, No. 3, March pp. 167.

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TABLE 6 - CODE OF TOXICANT CONCENTRATIONS FOR TOXAPHENE,
DDT*, PCB*, PENTACHLOROBENZENE*, AND HEXOCHLOROBENZENE.*

VALUE NUMBER	CONCENTRATION RANGE	MIDPOINT CONCENTRATION	
		PPB	PPM
1	0 - 100	50	0.05
2	101 - 200	150	0.15
3	201 - 1000	600	0.60
4	1001 - 2000	1500	1.50
5	2001 - 5000	3500	3.50
6	5001 - 10,000	7500	7.50
7	10,000 - 25,000	17,500	17.50
8	25,001 - 50,000	37,500	37.50
9	50,001 - 700,000*	375,000	375.00

*THESE PECTICIDES HAVE A MIDPOINT CONCENTRATION OF 75,000 PPB
OR 75. PPM FOR VALUE RANGE IN VALUE NUMBER 9.

TABLE 7 - CODE OF TOXICANT CONCENTRATIONS FOR CHLORDANE,
DIELDRIN, AND HEXACHLOROCYCLOHEXANE IN UPPER SOIL
SAMPLES OF OLIN AND CHECK SITES FOR INTERPRETATION
OF SYMAPS.

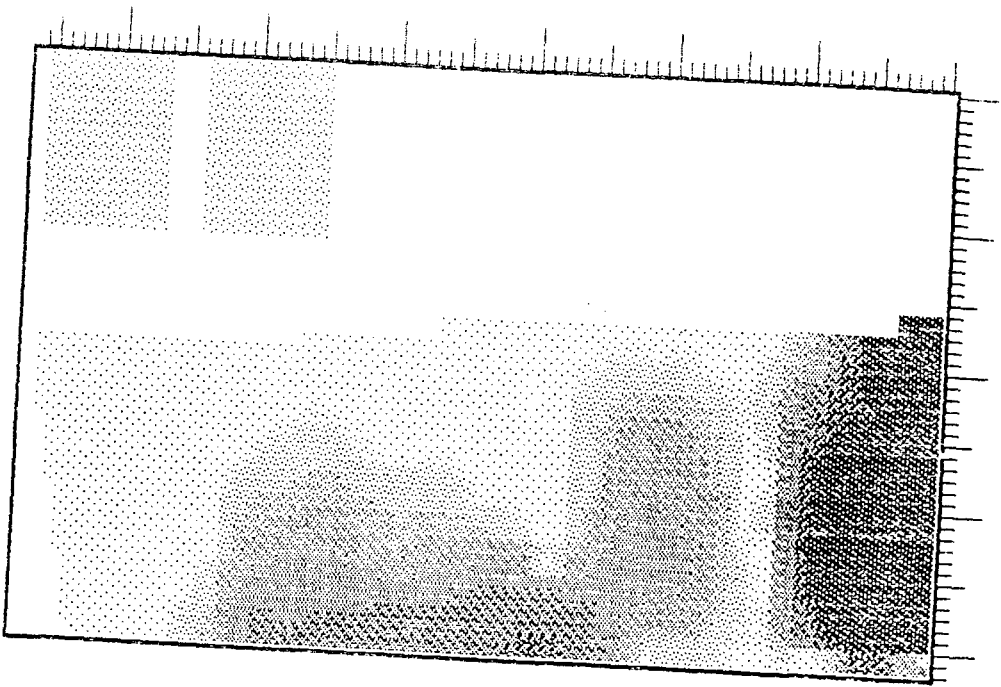
VALUE No.	CONCENTRATION RANGE	MIDPOINT CONCENTRATION	
		PPB	PPM
1	0 - 10	5	0.005
2	11 - 20	15	0.015
3	21 - 100	60	0.060
4	101 - 200	150	0.150
5	201 - 500	350	0.350
6	501 - 1000	750	0.750
7	1001 - 2500	1750	1.750
8	2501 - 5000	3750	3.750
9	5001 - 7000	6000	6.000

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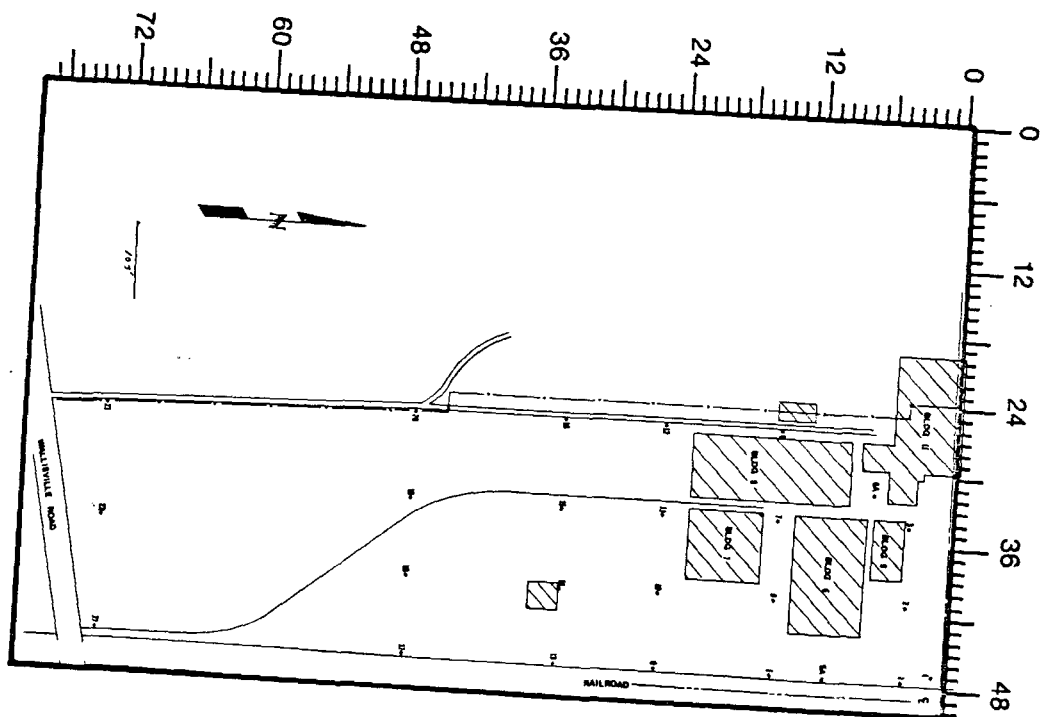
FIGURES 12 TO 20 ARE SYMAP PROJECTION MAPS OF THE
SPECIFIC TOXICANTS OVER THE OLIN AND CHECK SITES.

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TITLE: TOXAPHENE. CONCENTRATION. MAP

MAP: TOXAPHENE

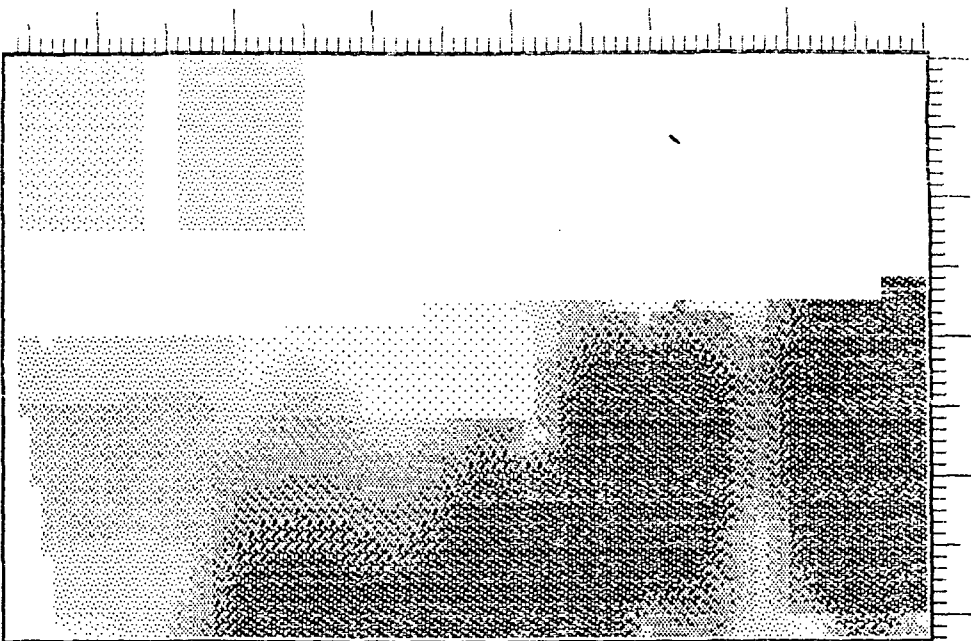


COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
0000000000	813	415	251	134	384	186	147	64	263	0

Fig. 12- SYMAP for Toxaphene

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TITLE: DDT. CONCENTRATION. MAP

MAP: DDT

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
OCCURANCES	187	192	439	251	97	124	192	161	857	0

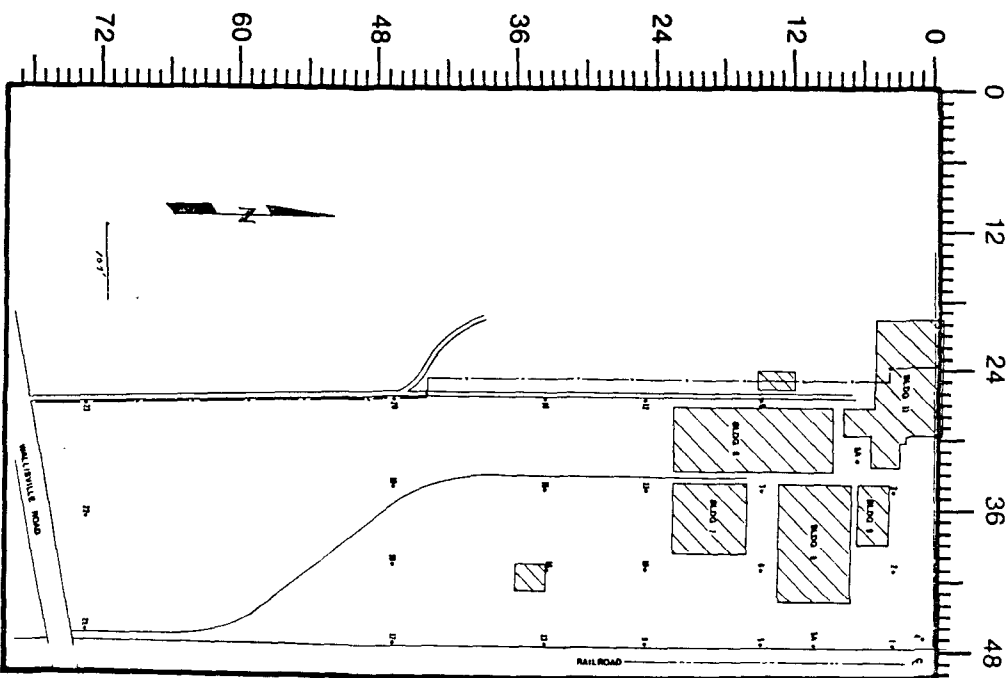
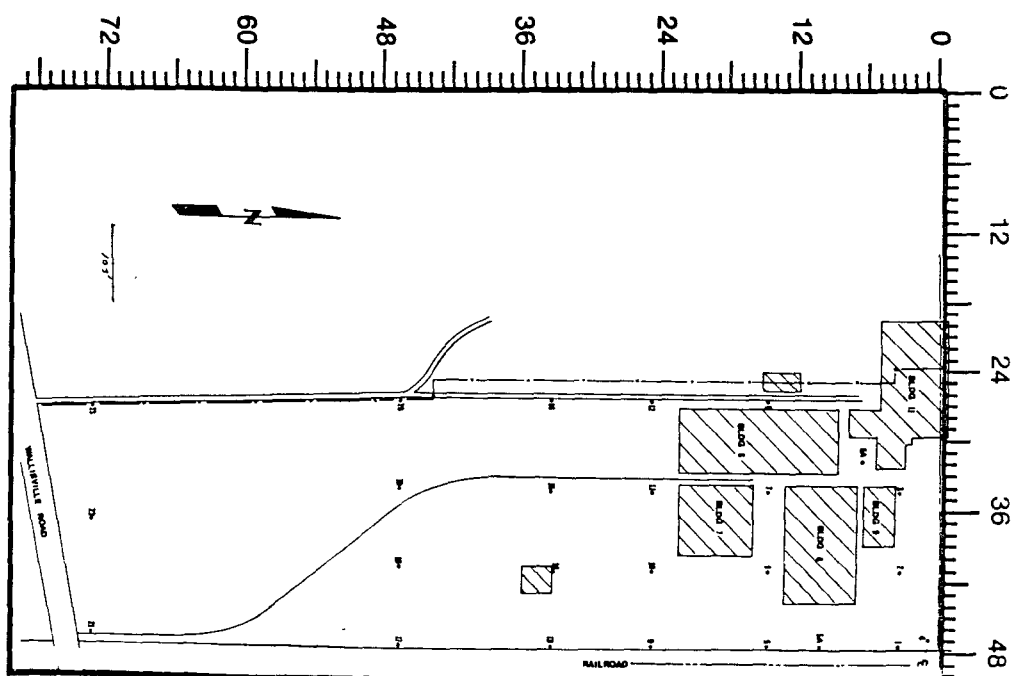
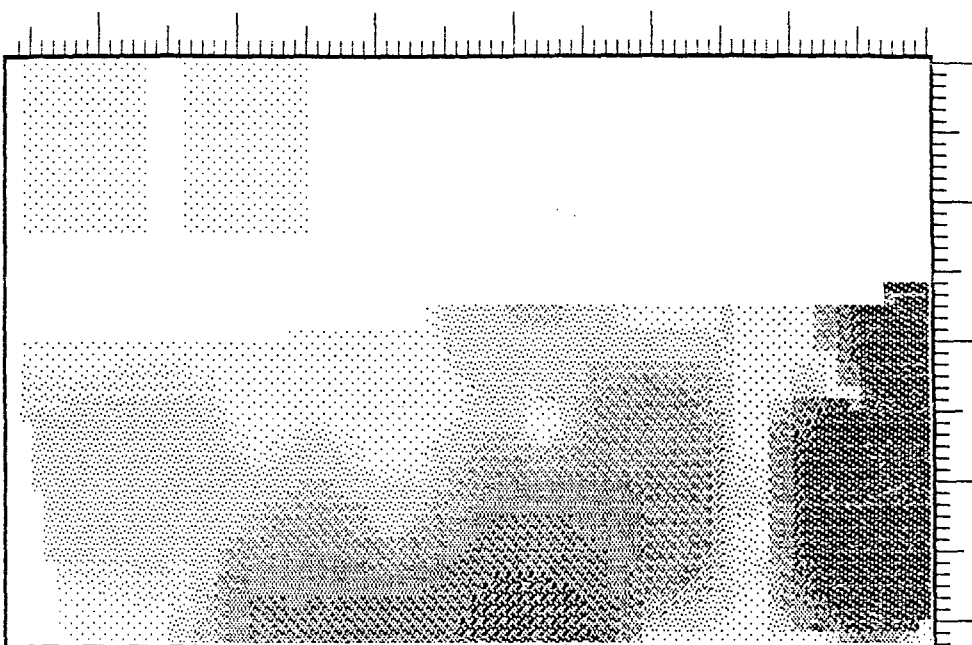


Fig. 13- SYMAP for DDT

SECRET



TITLE: PENTACHLOROBENZENE. CONCENTRATION. MAP

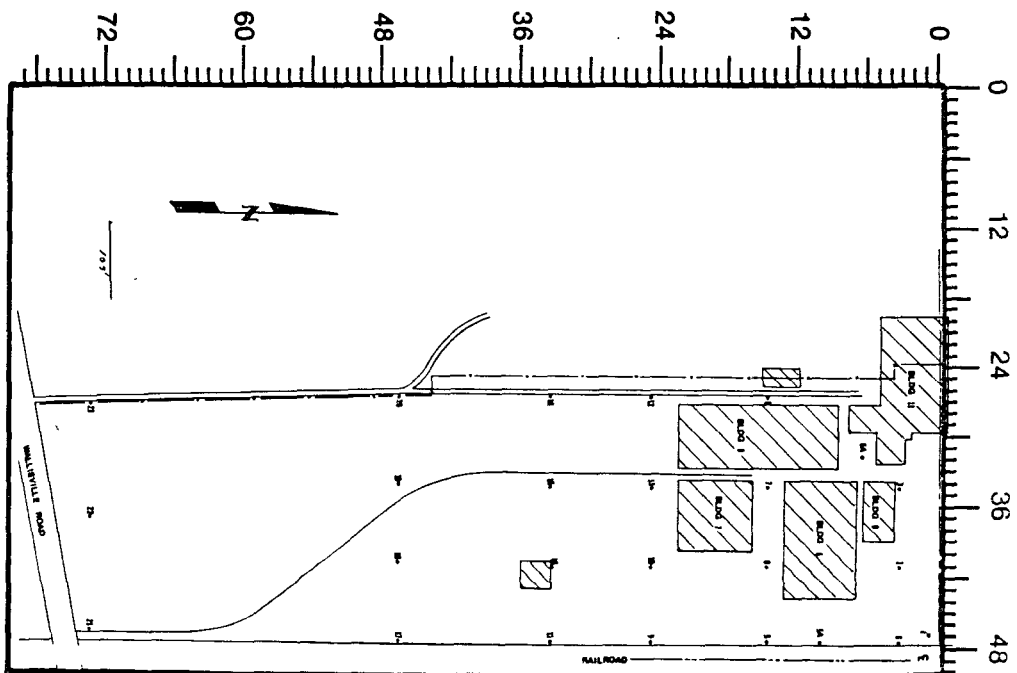
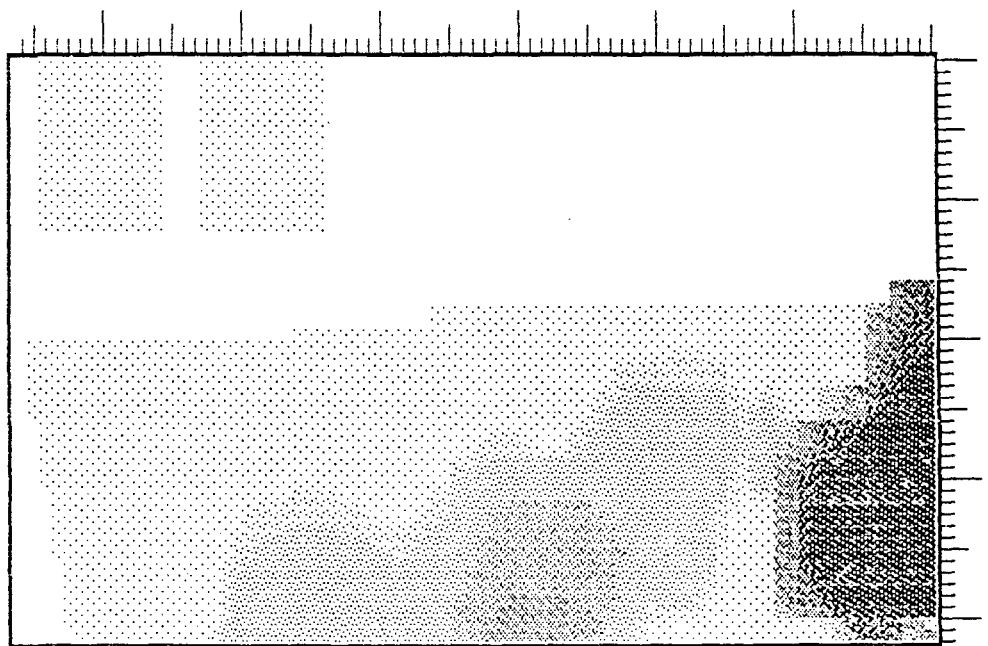
MAP: PENTACHLOROBENZENE

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
OCCURRENCES	737	152	536	138	265	156	175	86	252	0

Fig. 14- SYMAP for Pentachlorobenzene

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TITLE: HEXACHLOROBENZENE. CONCENTRATION. MAP

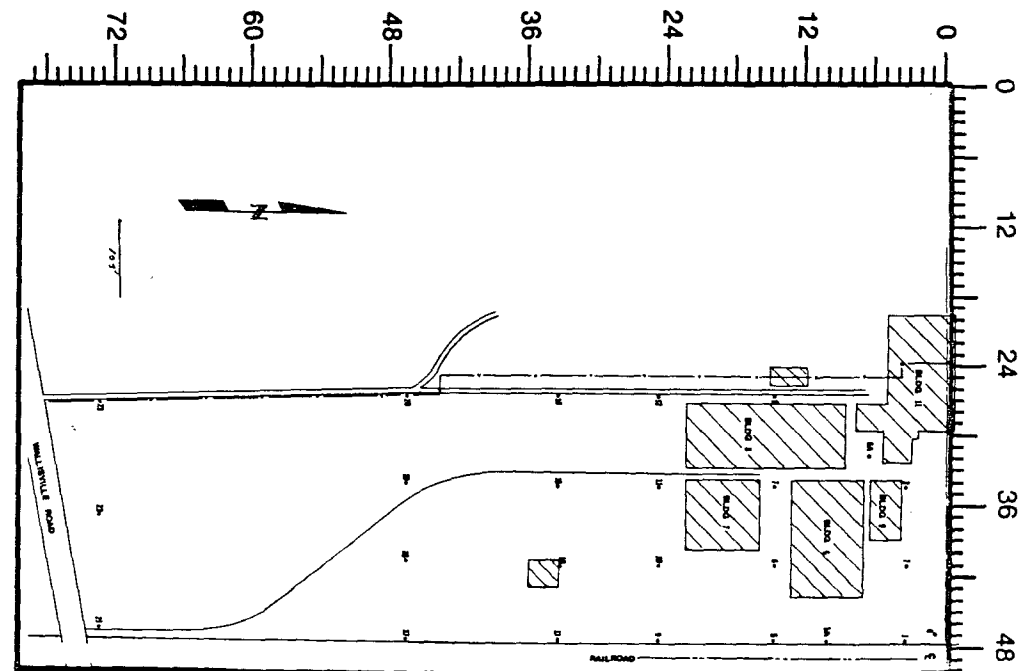
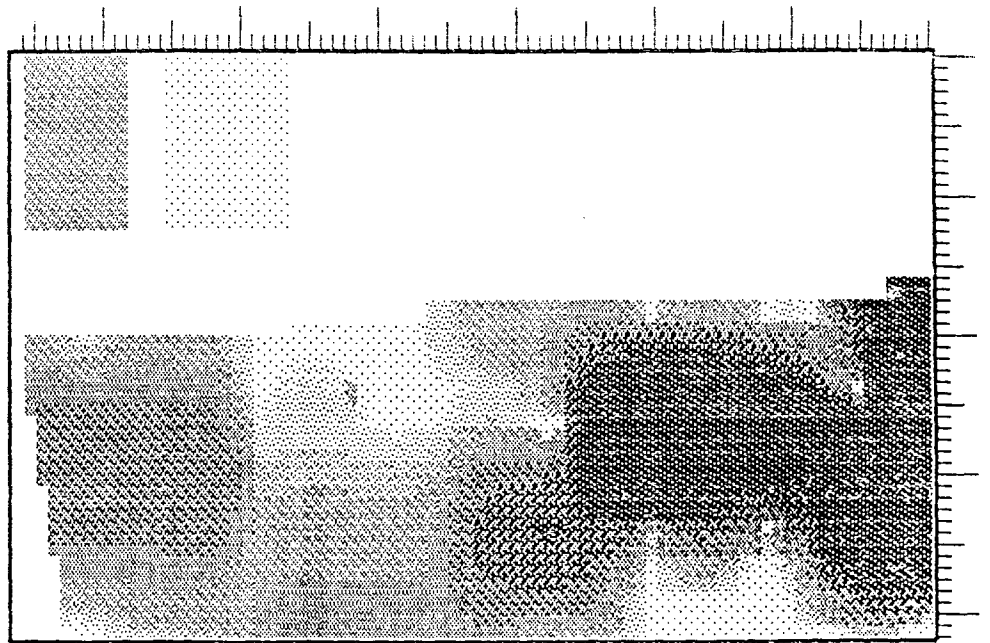
MAP: HEXACHLOROBENZENE

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	10
OCCURANCES	1423	131	477	130	50	22	32	45	186	0

Fig. 15- SYMAP for Hexachlorobenzene

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TITLE: PCB. CONCENTRATION. MAP

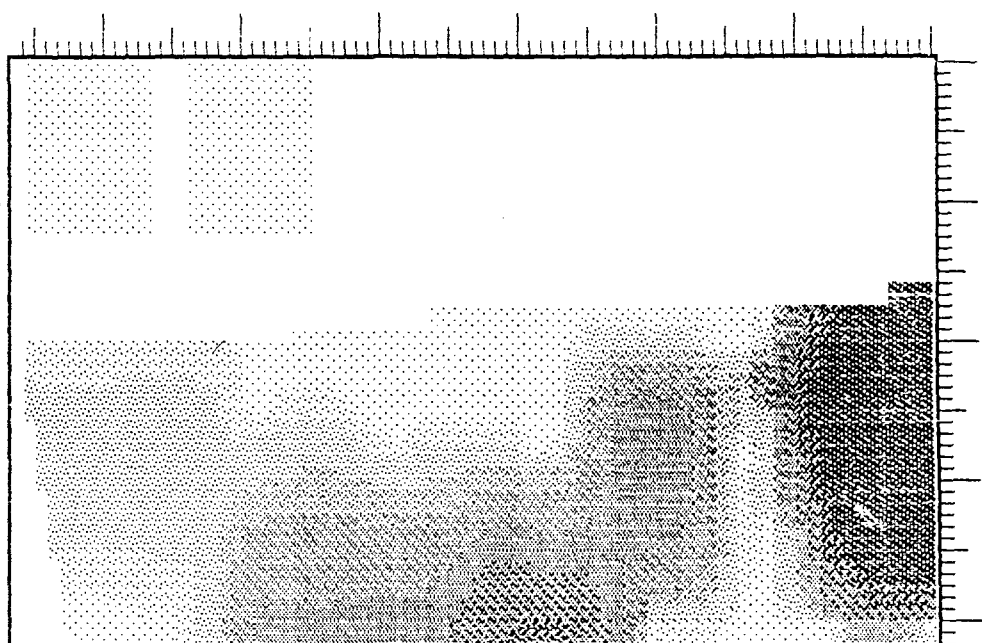
MAP: PCB

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
OCCURANCES	344	37	140	115	480	312	366	172	499	

Fig. 16- SYMAP for PCB

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TITLE: CHLORDANE. CONCENTRATION. MAP

MAP: CHLORDANE

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
OCCURANCES	668	246	454	188	310	248	113	67	281	0

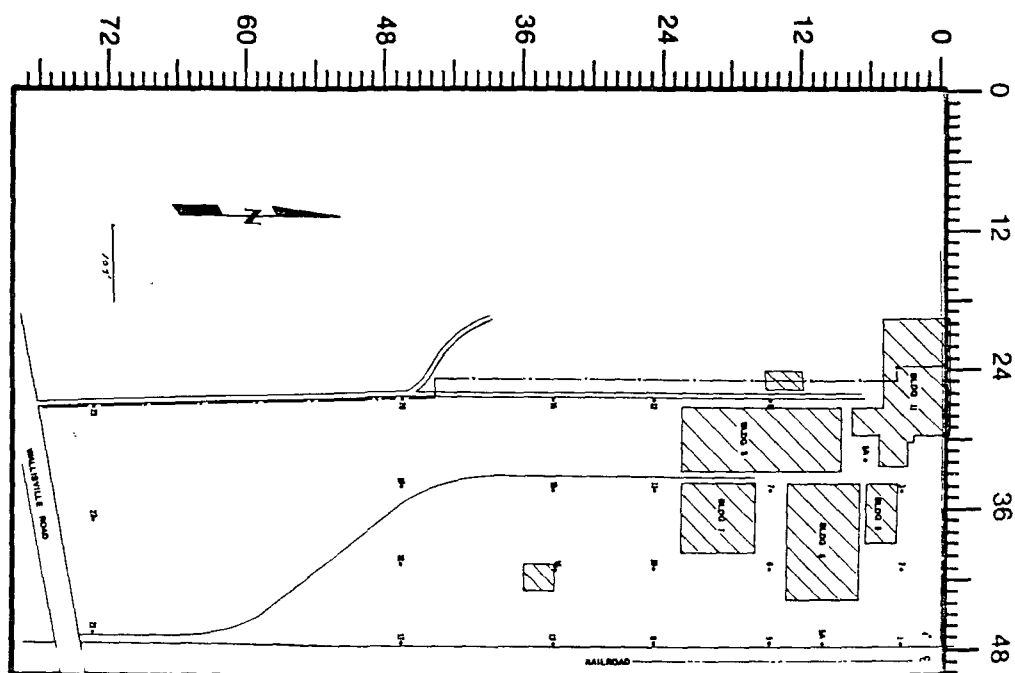
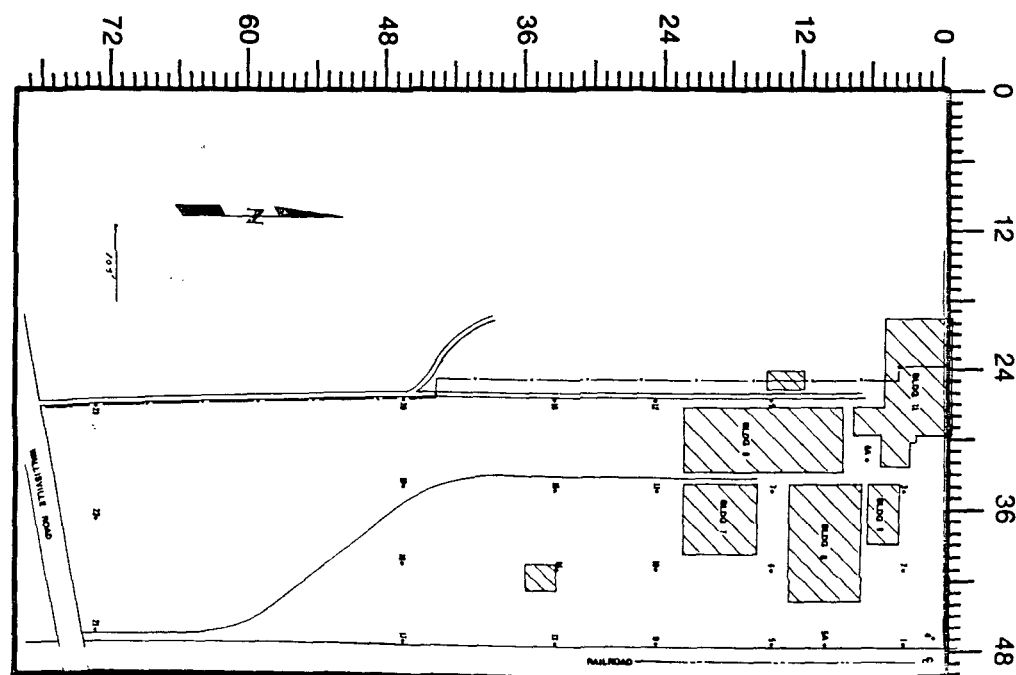
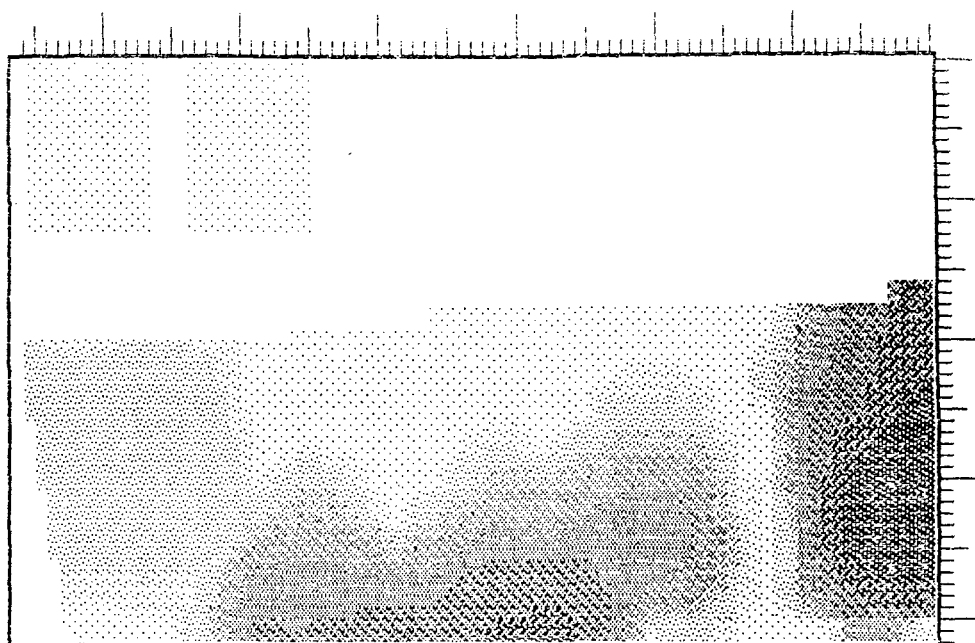


Fig. 17- SYMAP for Chlordane

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TITLE: DIELDRIN CONCENTRATION MAP

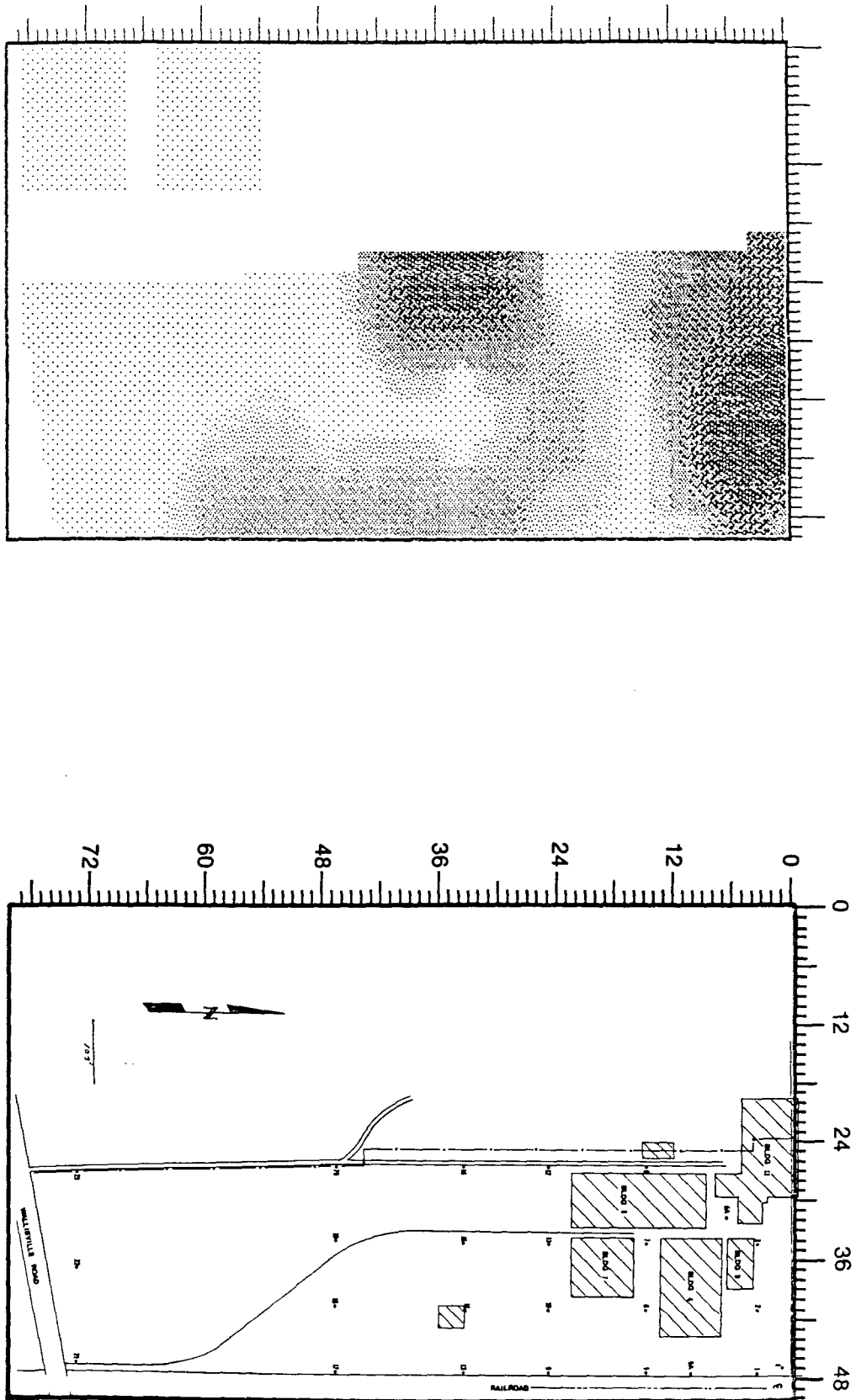
MAP: DIELDRIN

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
OCCURRENCES	854	175	521	175	198	216	195	112	104	

Fig. 18- SYMAP for Dieldrin

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TITLE: HEXACHLOROCYCLOHEXANE, CONCENTRATION, MAP

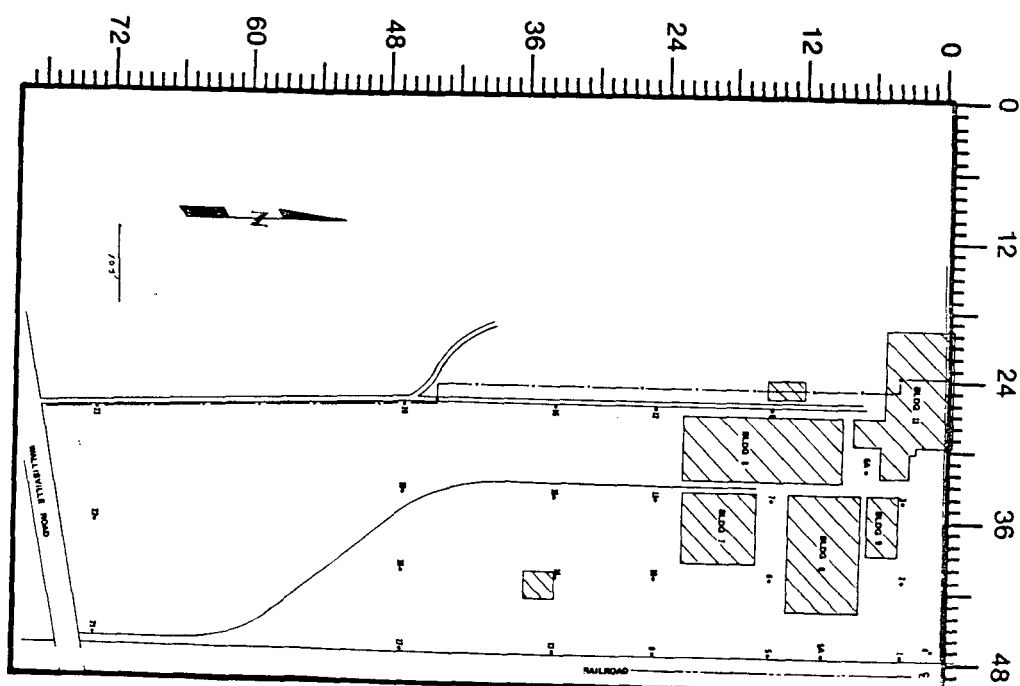
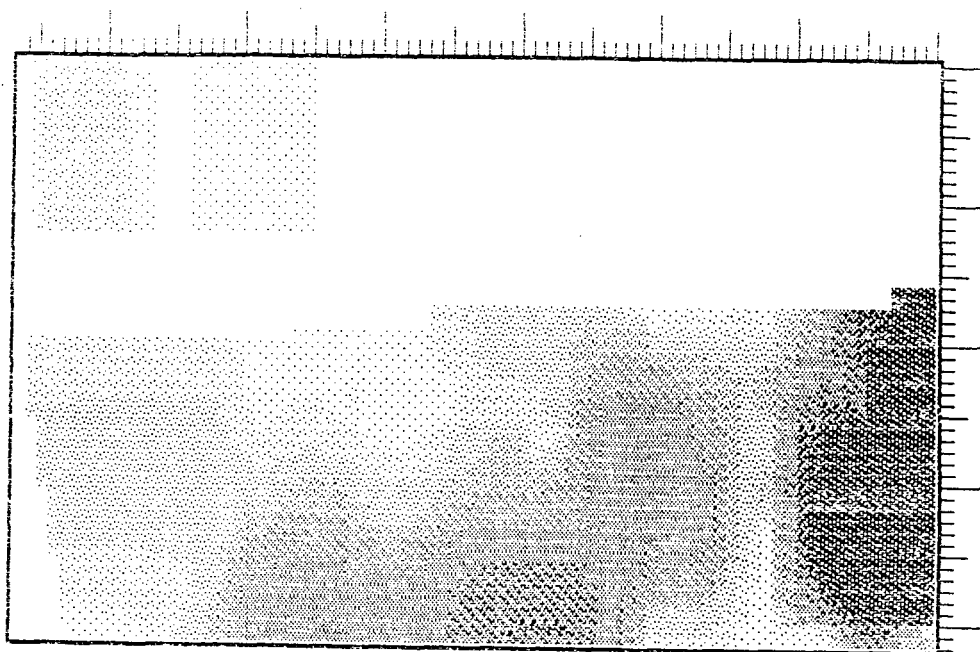
MAP: HEXACHLOROCYCLOHEXAN

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
OCCURANCES	1153	123	270	209	203	93	113	164	163	

Fig. 19- SYMAP for Hexachlorocyclohexane

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TITLE: TOTAL TOXICITY CONCENTRATION MAP

MAP: TOTAL TOXICITY

COUNTS BY SYMBOL TYPE

VALUE	1	2	3	4	5	6	7	8	9	0
DURANCES	403	453	479	184	229	356	114	38	283	

Fig 20- SYMAP for total toxicants

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4.3 Estimated amounts and concentrations of toxicants absorbed in soil profile of Olin and check sites and proportion of the respective sites contaminated by specific toxicants. Estimates were based on Symap concentrations and occurrence. Tables 8, 9, 10, and 11.

TABLE 8 - ESTIMATED AMOUNTS OF TOXICANT RETAINED IN THE
UPPER SOIL CORES OVER THE OLIN SITE.⁽¹⁾

<u>TOXICANT</u>	<u>QUANTITY</u>	
	(2) POUNDS	(2) KILOGRAMS
*TOXAPHENE	(0.70) 2271	(0.32) 1033
*DDT	(3.02) 982	(1.37) 466
**PENTACHLOROBENZENE	(0.22) 356	(0.10) 162
**HEXACHLOROBENZENE	(0.22) 227	(0.10) 103
**PCB	(8.12) 726	(3.69) 330
*CHLORDANE	(0.22) 40	(0.10) 18
*DIELDRIN	(0.22) 23	(0.10) 10
**HEXACHLOROCYCLO- HEXANE	(0.22) 26	(0.10) 12
TOTAL OVER OLIN SITE		4641
CHECK SITE-TOTAL		(12.9) (5.85)

(1) EPA ESTABLISHED THAT THE DISCHARGE INTO THE ENVIRONMENT OF 1 POUND (0.454 KILOGRAM) OF THE FOLLOWING TOXICANTS* AND 10 POUNDS (4.54 KILOGRAM)** CONSTITUTE A HAZARDOUS WASTE DISCHARGE (SEE REFERENCE No. 40 CFR 117.11).

(2) POUNDS OF RESPECTIVE TOXICANTS IN CHECK SITE.

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TABLE 9 - ESTIMATE MEAN CONCENTRATIONS OF TOXICANTS IN UPPER SOIL CORES IN OLIN SITE AND CHECK SITE. ⁽¹⁾

TOXICANT	CHECK	SITE OLIN	CONC. RATIOS OLIN/CHECK
	-- PPM --		
TOXAPHENE	0.15	48.7	324
DDT	0.37	34.6	94
PENTACHNOROBENZENE	0.05	12.9	258
HEXACHLOROBENZENE	0.05	7.91	158
PCB	1.75	24.8	15
CHLORDANE	0.005	0.99	198
DIELDRIN	0.005	0.77	154
HEXACHLOROCYCLOHEXANE	0.005	0.92	184
			<hr/>
			\bar{x} 173

(1) CONCENTRATIONS FOR RESPECTIVE TOXICANTS ARE MEAN VALUES BASED ON OCCURRANCES AND CONCENTRATION VALUES DELINEATED BY SYMAP FOR RESPECTIVE TOXICANTS.

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TABLE 10 - ESTIMATED PERCENTAGE OF OLIN SITE CONTAMINATED
WITH SPECIFIC TOXICANTS EXCEEDING 1 PPM CONCENTRATION IN SOIL ⁽¹⁾ AND OLIN/EPA STANDARD CONCENTRATION COMPARED.

<u>TOXICANT</u>	<u>EXCEEDS 1 PPM</u>	<u>MEAN CONC. RATIO OLIN/EPA</u>
	- % OF SITE -	
TOXAPHENE	46.9	48.7
DDT	77.4	34.6
PENTACHLOROBENZENE	49.5	12.9
HEXACHLOROBENZENE	21.5	7.9
PCB	82.3	24.8
CHLORDANE	18.6	0.99
DIELDRIN	19.0	0.77
HEXACHLOROCYCLOHEXANE	20.3	0.92
<u>CHECK SITE TOTAL</u>	<u>00.0</u>	

(1) THE 1 PPM CONCENTRATION IS USED BY EPA AS A GENERIC LEVEL FOR ALL ORGANIC PESTICIDES IN SOIL WHICH IF EXCEEDED, IS TERMED A HAZARDOUS CONCENTRATION.

REFERENCE: PERSONAL COMMUNICATION NOVEMBER, 1982
MR. DENNIS GUILD
EPA DALLAS, TEXAS 1201 ELM ST.
REGION VI
ENFORCEMENT DIVISION

2000000000

TABLE 11 - RELATIVE ESTIMATED MEAN CONCENTRATIONS OF TOXICANTS IN OLIN AND CHECK SITES TO ASSESS MAGNITUDE OF SOIL ADULTERATION.

TOXICANT	CHECK ⁽¹⁾ SITE	% OF OLIN SITE EXCEEDING CHECK VALUES	MEAN OF CONC. TOXICANT IN OLIN SITE EX- CEEDING CHECK VALUES
	PPM	%	PPM
TOXAPHENE	0.15	59	48.7
DDT	0.37	90	34.6
PENTACHLOROBENZENE	0.05	81	12.9
HEXACHLOROBENZENE	0.15	50	7.9
PCB	1.75	77	24.8
CHLORDANE	0.005	84	0.99
DIELDRIN	0.005	76	0.77
HEXACHLOROCYCLO- HEXANE	0.005	62	0.92
		\bar{x}	72.3

(1) REPRESENTS 100% OF THE CHECK SITE.

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1 4.4 Estimated concentrations of toxicants in ambient soil solutions
 2 in Olin and check site: Tables 12, 13, 14, 15, 16, 17, 18, and 19.

3 The estimated concentrations of soil toxicants in the ambient soil
 4 solution based on octanol-water partition coefficients (K_{ow}) for the
 5 respective pesticide toxicants in soil samples are given in Tables
 6 12-19. The impact of organic toxicants retained in the soil matrix
 7 on the quality of water bathing the matrix can be assessed by measuring
 8 the concentration of toxicants in the soil solution in equilibrium with
 9 soil particularly the organic carbon component.⁽³⁾ However, to deter-
 10 mine the equilibrium constant for a specific pesticide, in soil, absorp-
 11 tion isotherms of soils with different contents of organic matter and/
 12 or organic carbon must be developed. Intensive investigations have
 13 established however that octanol-water partition coefficients (K_{ow}) for
 14 specific pesticides (that is, the equilibrium constant (Ratio) of the
 15 pesticide concentration in a non-polar solvent like octanol and a
 16 polar solvent, water) are correlated with equilibrium constants of pesti-
 17 cides in water and soil organic carbon (K_{oc}) in a highly significant
 18 linear relationship (1,2) expressed by the following regression
 19 equation:

$$\text{Log } K_{oc} = 1.019 \times K_{ow} - 0.18 \quad \text{equation 1}$$

21 Thus, using equation 1, it becomes possible to determine the K_{oc} for
 22 any pesticide with a known K_{ow} . Once K_{oc} is determined then the
 23 following relationship permits the calculation of the toxicant in the
 24 ambient solution:

$$K_{oc} = \frac{\text{ug toxicant absorbed/g of organic C in soil}}{\text{ug/ml toxicant in ambient sol.}} \quad \text{equation 2}$$

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1 Since the K_{oc} , organic carbon concentration of Lake Charles Clay, and
2 concentration of toxicant absorbed by the soil are known, the calcula-
3 tion for the concentration of toxicant in ambient solution is straight
4 forward. Chiou⁽²⁾ has noted that absorbent - water partition coeffic-
5 ients as compared to octanol-water systems give linear isotherm rang-
6 ing up to 2000 ppm of organic toxic in equilibrium concentrations. Thus,
7 this method of estimating solution concentration for specific toxicants
8 has been used to assess bio-accumulation of pesticides.⁽⁴⁾

9 A recent reevaluation of the use of octanol-water partition co-
10 efficients to estimate the retention of pesticides in soil has shown
11 that the high exchange capacity of expanding clays specific in soils
12 contributes substantially to the retention of organic pesticides as well
13 as the organic carbon⁽⁵⁾ (also see Chiou⁽²⁾). The equilibrium solution
14 concentrations of the toxicants in the Olin site could increase due to
15 the presence of highly reactive clays coated with organic matter in-
16 herent in the soils of the Lake Charles series. However, to assess this
17 suggestion, soil isotherms would be required for specific pesticides
18 under conditions where the various components of the Lake Charles soil
19 are treated as independent variables.

20 Presence of toxic organic pesticides in the deeper soil profile
21 can be attributed to the movement of finer soil particulate-size fractions
22 (usually high in organic carbon and specific surface area) which have a
23 larger sorption partition coefficient than coarser fractions and thus
24 sorb more toxicant.⁽⁶⁾

25 In addition, the relatively high equilibrium concentrations of toxic-
26 ants in soil solutions within the soil surface layer are reduced when
27 the solutions percolate into deeper layers and toxicants are sorbed by

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1 the soil matrix. Thus, the equilibrium concentrations of toxicants in
2 soil solution reaching the water table (in the Olin site; a depth of
3 20') are usually attenuated. However, the very high levels of soil
4 toxicants in select soil sample locations in the Olin site precludes
5 a marked reduction of toxicant concentrations at the water table, a
6 reduction estimated at 40% of surface equilibrium levels. No water
7 samples (E. ditch, wells or cores) were taken at the Olin site because
8 the toxicant concentration in water would vary with rainfall, runoff,
9 and contribution from unknown sites thus confounding any definitive
10 effect of the soil from the Olin site may have had. In addition, soil
11 temperature and pH effect toxicant concentrations in water, but only
12 very slightly. Measurement of these parameters would not significantly
13 effect the result developed by the partition calculations.

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Literature Cited

- (1) Chiou, C.T., Louis Peters, V. Freed 1979. A physical concept of soil-water equilibrium for nonionic organic compounds, Science Nov. 16, vol. 206, pp. 831-832.
- (2) Chiou, C.T. 1981. Partition coefficient and water solubility in environmental chemistry. In Hazard assessment of chemicals: Current developments. Vol. 1. Edit. J. Saxena and F. Fisher, Academic Press, N.Y.
- (3) Rao, P.S.C. and Davidson, J.M. 1980. Estimation of pesticide retention and transformation parameters required in non-point source pollution models. In Environmental Impact of Non-Point Source Pollution, Ed. Overcash M.R., Davidson J.M. Pub. Ann Arbor Sci. Publ. Inc.
- (4) Chiou, C.T., V.H. Freed, D.W. Schemedding, R.L. Kohnort 1977. Partition coefficients and bio-accumulation of selected organic chemicals. Environ Sci, Technol. 11: 475-478.
- (5) Mingelgrin, U. and Gerstl A. 1983. Reevaluation of partitioning as a mechanism of nonionic chemicals absorption in soils. J. of Environmental Quality, Vol. 12, Number 1, pp. 1-111.
- (6) Rao, P.S.C., Nkedi-Kizza, P. and Davidson, J. M. 1981. In Pre-ceedings at the National Conference on Agricultural Management and Water Quality; Iowa State University, Ames, Iowa, Mag, 1981.

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4.4 Estimated concentrations of toxicants in ambient soil solution
of Olin site based on Symap concentration - areal distribution
projections. Tables 12-19.

TABLE 12 - EQUILBRIUM CONCENTRATIONS OF TOXAPHENE ESTIMATED IN
 AMBIENT SOIL SOLUTION OF UPPER SOIL CORES IN OLIN
 AND CHECK SITE CALCULATED FROM CONCENTRATION VALUES
 OF SOIL SAMPLES EXCEEDING 1 PPM AND TOXAPHENE EX-
 PERIMENTALLY DERIVED K VALUES. ⁽¹⁾

TOXAPHENE ⁽²⁾ IN SOIL CORES	EQUILBRIUM ⁽³⁾ CONC. OF TOXAPHENE IN SOIL SOLUTION	OCCURRENCE IN SITE
UG/G	UG/ML	%
1.5	0.08	6.2
3.5	0.19	10.8
7.5	0.42	8.5
17.5	1.02	6.8
37.5	2.18	2.5
375.0	21.91	12.1
	\bar{X} 6.04	TOTAL OF SITE 46.9
CHECK SITE		
> 1.0	0.0	100

(1) K VALUES GIVEN IN: P.S.C. RAO AND J.M. DAVIDSON, 1980.
 ESTIMATION OF PESTICIDE RETENTION AND TRANSFORMATION
 PARAMETERS REQUIRED IN NON-POINT SOURCE POLLUTION MODELS.
 ENVIR. IMPACT OF NON-POINT SOURCE POLLUTION EDIT. M.R.
 OVERCASH AND J.M.DAVIDSON, ANN ARBOR SCIENCE PUBL. INC.

(2) MIDPOINT VALUES OF CONCENTRATION RANGES USED IN SYMAP.

(3) MAXIMUM ALLOWABLE CONCENTRATION IN COMMUNITY AND NAVIGABLE
 WATERS ESTABLISHED BY EPA IS 0.005 MG/L (UG/ML. PPM).
 REFERENCE: 40 CFR 141.12 AND 40 CFR 129.103 (3).

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TABLE 13 - ESTIMATED EQUILBRIUM CONCENTRATION OF DDT IN AMBIENT SOIL SOLUTION OF UPPER SOIL CORES IN OLIN AND CHECK SITE CALCULATED FROM CONCENTRATION VALUES OF SOIL SAMPLES EXCEEDING 1 PPM DDT AND EXPERIMENTALLY DERIVED K VALUES. (1)

DDT ⁽²⁾ IN SOIL CORES	EQUILBRIUM CONC. OF DDT IN SOIL SOLUTION	OCCURRENCE IN SITE
UG/G	UG/ML	%
1.5	0.00031	11.6
3.5	0.00072	4.5
7.5	0.0015	5.7
17.5	0.0036	8.9
37.5	0.0077	7.4
75.0	0.0200	39.3
	\bar{X} 0.02	TOTAL OF SITE 77.4
CHECK SITE		
>1.0	0.00	100

(1) AS IN TABLE 12

(2) AS IN TABLE 12

(3) MAXIMUM ALLOWABLE CONCENTRATION IN COMMUNITY AND NAVIGABLE WATERS ESTABLISHED BY EPA IS 0.001 UG/L OR 0.000001 UG/ML (PPM). REFERENCE: 40 CFR 129.101 (3).

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TABLE 14 - ESTIMATED EQUILBRIUM CONCENTRATION OF DIELDRIN IN AMBIENT SOIL SOLUTION OF UPPER SOIL CORES IN OLIN AND CHECK SITE CALCULATED FROM CONCENTRATION VALUES OF SOIL SAMPLES EXCEEDING 1 PPM DIELDRIN AND EXPERIMENTALLY DERIVED K VALUES. ⁽¹⁾

DIELDRIN ⁽²⁾ IN SOIL CORES	EQUILBRIUM CONC. OF DIELDRIN IN SOIL SOLUTION	OCCURRENCE IN SITE
UG/G	UG/ML	%
1.75	0.03	9.0
3.75	0.06	5.2
6.00	0.10	4.8
	\bar{X} 0.06	TOTAL OF SITE 19.0
CHECK SITE		
> 1.0	0.00	100.0

(1) AS IN TABLE 12

(2) AS IN TABLE 12

(3) MAXIMUM CONTAMINANT LEVELS OF DIELDRIN IN COMMUNITY AND NAVIGABLE WATERS ESTABLISHED BY EPA IS 0.003 UG/L OR 0.000003 UG/ML. REFERENCES: 40 CFR 129.100 (3).

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TABLE 15 - ESTIMATED EQUILBRIUM CONCENTRATIONS OF CHLORDANE
IN AMBIENT SOIL SOLUTION OF UPPER SOIL CORES IN
OLIN AND CHECK SITE CALCULATED FROM CONCENTRATION
VALUES OF SOIL SAMPLES EXCEEDING 1 PPM CHLORDANE
AND EXPERIMENTALLY DERIVED K_d VALUES. ⁽¹⁾

CHLORDANE ⁽²⁾ IN SOIL	EQUILBRIUM CONC. OF CHLORDANE	OCCURRENCE IN SITE
UG/G	UG/ML	%
1.75	0.076	5.2
3.75	0.170	2.6
6.00	0.270	10.8
	\bar{X} 0.20	TOTAL OF SITE 18.6
CHECK SITE		
> 1.0	0.00	100.0

(1) AS IN TABLE 12

(2) AS IN TABLE 12

(3) MAXIMUM CONCENTRATIONS OF CHLORDANE IN COMMUNITY AND
NAVIGABLE WATERS ESTABLISHED BY EPA IS 0.003 UG/L OR
0.000003 UG/ML. REFERENCES: 40 CFR 117.3, CFR 53:0110-3.

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TABLE 16 - ESTIMATED EQUILBRIUM CONCENTRATIONS OF HEXACHLORO-
BENZENE IN AMBIENT SOIL SOLUTION OF UPPER SOIL
CORES IN OLIN AND CHECK SITE CALCULATED FROM CON-
CENTRATION VALUE OF SOIL SAMPLES EXCEEDING 1 PPM
AND HEXACHLOROBENZENE AND EXPERIMENTALLY DERIVED
K VALUES. ⁽¹⁾

HEXACHLOROBENZENE ⁽²⁾ IN SOIL CORES	EQUILBRIUM ⁽³⁾ CONC. OF HEXACHLORO- BENZENE IN SOIL SOLUTION	OCCURRENCE IN SITE
UG/G	UG/ML	%
1.5	0.00035	6.0
3.5	0.0008	2.3
7.5	0.0018	1.0
17.5	0.004	1.5
37.5	0.009	2.1
75.0	0.018	8.6
	\bar{X}	TOTAL
	0.009	21.5
CHECK SITE		
>1.0	0.00	100.0

(1) AS IN TABLE 17

(2) AS IN TABLE 12

(3) MAXIMUM ALLOWABLE CONCENTRATIONS OF HEXACHLOROBENZENE
IN COMMUNITY AND NAVIGABLE WATERS ESTABLISHED BY EPA
IS 0.000003 UG/ML (PPM).

REFERENCE: 40 CFR 129.100 (3)

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TABLE 17 - ESTIMATED EQUILIBRIUM CONCENTRATIONS OF BIPHENYL (PCB) IN AMBIENT SOIL SOLUTION OF UPPER SOIL CORES IN OLIN AND CHECK SITE CALCULATED FROM CONCENTRATION VALUES OF SOIL SAMPLES EXCEEDING 1 PPM BIPHENYL AND EXPERIMENTALLY DERIVED K VALUES. ⁽¹⁾

PCB IN SOIL CORE	EQUILIBRIUM CONC. ⁽²⁾ OF PCB IN SOIL SOLUTION		OCCURRENCE IN SITE
	UG/G	UG/ML	
1.5		0.01	5.4
3.5		0.02	14.7
7.5		0.05	14.4
17.5		0.17	16.9
37.5		0.25	7.9
75.0		0.50	23.0
		<hr/>	
	X	0.012	TOTAL 82.3
CHECK SITE			
3.5		0.02	12.7
	\bar{X}	0.02	

(1) DERIVED K VALUES FROM: CHIOU C.T. 1981 PARTITION COEFFICIENT AND WATER SOLUBILITY IN ENVIRONMENTAL CHEMISTRY, IN HAZARD ASSESSMENT OF CHEMICALS: CURRENT DEVELOPMENT, VOL. 1. EDITORS; J. SAXENA AND F. FISHER, ACADEMIC PRESS, NEW YORK.

(2) AS IN TABLE 12

(3) MAXIMUM CONCENTRATIONS OF PCB IN COMMUNITY AND NAVIGABLE WATERS ESTABLISHED BY EPA IS 0.001 UG/L OR 0.000001 UG/ML (PPM). REFERENCE: 40 CFR 129.105. ⁽⁴⁾

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TABLE 18 - ESTIMATED EQUILBRIUM CONCENTRATIONS OF HEXACHLORO-CYCLOHEXANE IN AMBIENT SOIL SOLUTIONS OF UPPER SOIL CORES IN OLIN AND CHECK SITE CALCULATED FROM CONCENTRATION VALUES OF SOIL SAMPLES EXCEEDING 1 PPM HEXACHLOROCYCLOHEXANE AND EXPERIMENTALLY DERIVED K VALUES. (1)

HEXACHLOROCYCLO- HEXANE IN SOIL CORE	EQUILBRIUM CONC. OF HEXACHLORO- CYCLOHEXANE IN SOIL SOLUTION	OCCURRENCE IN SITE
UG/G	UG/ML	%
1.75	0.000005	5.2
3.75	0.00009	7.6
6.00	0.0002	7.5
	\bar{X} 0.0008	TOTAL OF SITE 20.3
CHECK SITE		
> 1.0	0.0	100.0

(1) AS IN TABLE 12

(2) AS IN TABLE 12

(3) MAXIMUM ALLOWABLE CONCENTRATION OF HEXACHLOROCYCLOHEXANE IN COMMUNITY AND NAVIGABLE WATERS ESTABLISHED BY EPA IS 0.004 MG/L (0.004 UG/ML PPM). REFERENCE: 40 CFR 141.12

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TABLE 19 - COMPARISON OF SELECT TOXICANT CONCENTRATIONS IN AMBIENT SOIL SOLUTION IN OLIN AND CHECK SITE FOR SOIL SAMPLE CONCENTRATIONS EXCEEDING 1 PPM OF RESPECTIVE TOXICANT.

TOXICANT	MEAN EQUILIBRIUM CONC. IN SOIL SOLUTION OVER SITE		EPA LIMIT IN WATER	CONC. (1) RATIOS OLIN/EPA
	CHECK	OLIN		
	PPM	PPM		
TOXAPHENE	0.0	6.04	0.005	1208
DDT	0.0	0.02	0.000001	20,000
DIELDRIN	0.0	0.06	0.000003	20,000
CHLORDANE	0.0	0.20	0.000003	66,666
PCB	0.02	0.012	0.000001	12,000 (CHECK SITE 20,000)
HEXACHLORO- BENZENE	0.0	0.009	0.000003	3,000
HEXACHLORO- CYCLOHEXANE	0.0	0.0008	0.004	0.2


(1) CONCENTRATION RATIO IS MEAN ESTIMATED CONCENTRATION OF TOXICANT CALCULATED IN SOIL SOLUTION OVER OLIN SITE COMPARED TO EPA ALLOWABLE LIMITS.

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1 Section 5 -Assessment of soil contamination of Olin site as of June,
2 1982.

3 5.1 Analysis of data in Table 1 (Section 1.3), the field description
4 of soil cores.

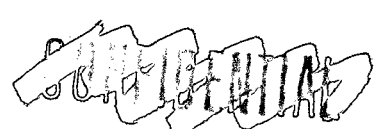
5 Foreign materials varying from glassy grit, stones-concrete to
6 powdered sulfur and lime in the soil profile of the Lake Charles series
7 underlying the mantle of the Olin site was observed in the shallow
8 and deep cores taken in the northern portion of the site encompassing
9 sample locations 1-12. The strong, chemical odors emitted from the
10 cores indicates the presence of volatile organic compounds in amounts
11 that have exceeded the absorptive capacity of the soil and the attenua-
12 tion of the degrading process. These observations are evidence of
13 past industrial activities involved in the manufacture and disposal
14 of organic compounds. The absence of chemical odors is evident in
15 the cores of the check sites where the odor and appearances of the
16 profile are typical of uncontaminated, fresh Lake Charles clay soil.
17 Soil samples from the southern position of the site (sample locations
18 15-21) are relatively free of debris and volatile substances with
19 odor indicating that this area had been utilized for plant operations
20 that did not involve the manufacture or disposal of material similar
21 to those in the northern portion of the site. In addition, the soil
22 cores indicate a higher concentration of materials in the area of
23 samples 13 and 17 possibly a disposal site as delineated by the air
24 photographs, Symap, and chemical analysis.

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1 5.2 Analysis of Symap and data in Tables 8-11 (Section 4.1, 4.2, and
2 4.3)

3 It is quite obvious from the Symap projections that the soil in the
4 Olin site is contaminated with the respective toxicants at concentrations
5 many times greater than the check sites. Symap also identifies the area
6 of highest contamination as the northern portion of the Olin site in the
7 area of pre-existing plant buildings and manufacturing activities. The
8 soil adjacent to the E. fence and drainage channel also show relatively
9 high levels of the respective toxicants. The compound PCB appears to be
10 ubiquitous in this environment as it is found in the soil over the entire
11 Olin site and the check site as well. This Symap clearly shows the site
12 of the pre-existing buildings and the area of high concentration near
13 the E. fences as single-point source (see CFR No. 40 260:10 for defini-
14 tion) of toxicants over the Olin site.

15 The data developed for Table 8 estimates the amounts of toxicants
16 discharged into the environs from the manufacturing activities which
17 have accumulated in the upper soil profile to 24" depth during the
18 period of plant operation. The plant had discharged sufficient quanti-
19 ties of the respective toxicants into the environment to raise levels
20 absorbed by the soil to levels exceeding the amounts defined by EPA as
21 hazardous discharge by 2-2000 times. This range identifies only the
22 toxicants retained in the upper layers of the soil at the time of
23 sampling and does not measure the amounts that have moved into the deep
24 soil matrix and through the soil into the ground water during the opera-
25 tion of the Olin plant. Deep soil sample analysis has shown that the
26 toxicants have moved deeper into the profile where quantities 15-85% of
27 the surface amounts are retained (see chemist report-Appendix). A total



1 of 4641 pounds of toxicants were estimated to be retained in the upper
2 soil depth over the Olin site and only 12.9 pounds in the check site at
3 the time of sampling (Table 8).

4 Comparision of toxicant concentrations in soil of the check and
5 Olin site are given in Tables 9, 10, and 11. For example, in Table 9,
6 the mean concentration of toxaphene in the Olin site soil is 49.7 ppm
7 and 0.15 ppm in the check site indicating that the toxaphene is 324
8 times more concentrated over 47% of the Olin site. The toxicant DDT is
9 94 times (Table 9) more concentrated than the check site over 90% of the
10 Olin site (Table 11). When the mean concentrations of the respective
11 toxicants in the Olin site that exceed 1 ppm are compared to an EPA
12 standard of 1 ppm (see footnote Table 10) the range for all toxicants
13 was 1-48 times greater than the EPA standards (see Tables 10 and 11) over
14 18% to 82% of the Olin site.

15 5.3 Analysis of data in Tables 12-19, the concentration of soil toxicants
16 in equilibrium with toxicant in ambient solutions.

17 The magnitude of soil contamination can also be assessed from the
18 concentration of the respective soil toxicants in equilibrium with toxic-
19 ant in the ambient soil water. The concentration of toxaphene in the
20 ambient solution in equilibrium with the soil in the upper layer of the
21 profile at different concentrations is given in Table 12. Employing
22 calculations described in Section 4.4, the concentration of toxaphene
23 in the ambient soil solution is estimated at 0.08 ug/ml (ppm). At the
24 highest midpoint level of soil toxaphene, 375 ug/g, the estimated solut-
25 ion concentration is 21.9 ug/ml. The data in Tables 13-18 for the re-
26 maining toxicants were generated and analysed in a similar manner. In
27 the case of toxaphene, 46.9% of the Olin site exceeded 1 ppm which con-

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1 tributed a mean concentration of 6.04 ug/ml in the ambient solution.
 2 When this value is compared to the maximum allowable concentration of
 3 toxaphene in community and navigable water by EPA that is 0.005 ppm
 4 (see footnote Table 12), the concentration of toxaphene in ambient soil
 5 is 1208 times greater than the EPA allowable limit (See Table 19). The
 6 estimated solution concentration and areal distribution for the remain-
 7 ing toxicants are given in Tables 13-18. Since the soil concentration
 8 levels of the toxicants in the check sites did not reach the 1.00ppm
 9 set by EPA, the ambient solution concentrations were not calculated
 10 except for PCB where K_{OW} values at a mid point soil concentration of
 11 3.5 ppm estimates PCB at 0.02 ppm in ambient solution over 12.7% of the
 12 check sites. In the Olin site the mean solution concentration of PCB
 13 was 0.012 ppm over 28% of that site.

14 The collation of data from Tables 12-18 and the ratios between
 15 toxicant concentration in soil solution and EPA allowable limits in
 16 water--are given in Table 19. For each toxicant, except hexachloro-
 17 clohexane, their mean concentration in solution exceeds the EPA allow-
 18 able limits by a range of 1208 to 66,666.

24 C.B.I. CLAIM WAS WAIVED
 25 - 40 C.F.R. §2.205(d)(1) -
 26 - [J.L.T. (6C-H) Dec 83] -
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1 5.4 Analysis of deep soil samples to assess soil contamination in
2 Olin and check sites.

3 The following assessment is based on data of sample sites 2, 6A,
4 13, 17, and 20 presented in Tables A1, A2, and Figure 1 of the chemists
5 report, pp. 30-32 (See Appendix).

6 The relative toxaphene concentration in the surface (upper) soil
7 samples and the deep samples 2' are given in Table A1. The integrated
8 areas of the chromatograph peaks represent the relative concentration of
9 toxaphene components and other pesticides in the soil extracts. Assign-
10 ing a relative value of 1.0 to the concentration of the toxaphene com-
11 ponents to sample extract 6A-1, the magnitude of soil contamination of
12 the remaining samples is compared to the 6A-1 standard. Sample 6A-1 was
13 chosen as the standard because the peak areas indicated a mean concen-
14 tration range identified in Table 2. Thus, the concentration of
15 toxaphene components in sample 2-1 relative to the standard is 9.9 while
16 sample 17-1 is only 0.19. The important relationships given in Table
17 A2 and depicted in Figure 1 show the concentration of toxaphene com-
18 ponents in the deep soil samples relative to the concentration in the
19 upper soil profile.

20 Employing a standard of 100% for the upper samples the deeper
21 samples, those under 2 ft., exhibit concentration ranging from 80% to
22 15% of the upper concentration in soil samples 2, 6A, 13, and 17. The
23 concentration in the deep samples for location 20 was undetectable
24 reflecting the very low concentration in the upper profile (See Table
25 2 and Table A1). There are several implications in these data:
26 1. The unusual persistence of the toxicants is manifest by the high
27 concentrations found in the soil profile. Hazardous levels of all

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1 toxicants are still evident 10 years after the plant operations have
2 ceased attesting to the very slow degrading processes operating in
3 the Olin site and the continuous cumulative building of toxicants in
4 the soil during the period of manufacturing activities (1938-72).

5 2. The slow, downward migration of upper level toxicants in the profile
6 also attests to the persistence of the toxicants and the long-term
7 adverse impact on the quality of ground water.

8 3. The concentration of toxicants in the deeper profile, although
9 15% - 80% of the upper concentration still constitutent a hazard, as
10 defined by EPA, in the soil and ground water to biological life and
11 health.

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1 5.5 Summary assessment and concluding statements.

2 Chemical analysis of randomized acquired soil samples over the
3 Olin and check sites provided the data base for a rigorous assessment
4 of soil contamination.

5 Symap projection have clearly delineated the location of pre-
6 existed plant buildings and areas of manufacturing activities as
7 single point sources of soil contamination in the Olin site. Existence
8 of a waste disposal area located on the Olin property near the E.
9 fence line and drainage channel was also evident in the Symap pro-
10 jections and independently assessed from distributions - concentration
11 level of soil samples by the team of organic chemists (see report -
12 Appendix).

13 The actual amounts of select toxicants in the soil profile of
14 the Olin site at the time of sampling exceeds the quantities found on
15 the check site by a factor range of 100-3000. Approximately 72% of
16 the Olin site was contaminated by toxicant exceeding the check values.
17 However, when these amounts are compared to EPA values for quantities
18 termed "hazardous wastes discharge" the amounts calculated for the
19 Olin site range from 2-2000 times greater than the EPA level, attesting
20 to the magnitude of soil contamination at this site (See Table 8).
21 Utilizing a generic level of 1 ppm toxicant in the soil as an EPA
22 limit for organic pesticides which if exceeded constitutes a "hazardous
23 concentration", the concentration of toxicants in soil of the Olin
24 sites exceeds the EPA limit from 0.77 to 48.7 fold over 72% of the
25 site.

26 Concentrations of specific toxicants in the ambient soil solution
27 in equilibrium with the soil toxicant shows extremely high solute levels

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1 compared to EPA maximum allowable limits in community and navigable
2 waters. The concentration of toxicants in ambient solution over 41%
3 of the Olin site ranges from 0.0008 ppm for hexachlorocyclohexane to
4 6.04 ppm for toxaphene or a range of 0.2 to 66,666 times the maximum
5 allowable limits set by EPA.

6 Analysis of deep soil samples show the persistence of the toxicants
7 has exceeded the normal half-life (See Sections 6.1 of Appendix).
8 Presence of toxicants in upper and deeper soil depth at levels that
9 constitute a hazard to biological life and health are evident 10 years
10 after the plant operations had ceased. Concentrations of toxicants in
11 the deep samples range from 15-80% of the surface value, yet these
12 concentration exceed EPA allowable limits for soil and water and there-
13 fore constitute a hazardous waste.

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1 Concluding Statements

2 It is the professional opinion of the principal scientist and
3 consultant to this study that the soil in the Olin site is contaminated
4 with select toxic organic substances at concentrations which are
5 hazardous to biological life and health as defined by EPA. This
6 opinion is based on a rigorous, logical assessment of facts from data
7 of several sources developed during this study.

- 8 1. The upper soil profile (12-24") under the mantle over
9 50% of the Olin sites contain amounts of toxaphene, DDT
10 and metabolites, chlordane, dieldrin, pentachlorobenzene,
11 hexachlorobenzene, and PCB that respectively and in
12 total exceed the EPA limits defined as a hazardous dis-
13 charge by factors ranging 2-2000 times.
- 14 2. The soil concentrations of the respective toxicants
15 listed in (1) above have exceeded the generic maximum
16 limit of 1 ppm (utilized by EPA) over 50% of the Olin
17 site by factors ranging from 0.8 to 48.7 times.
- 18 3. Deep soil cores (24" to 72") in select locations
19 demonstrate that 15-85% of the toxicant concentrations
20 in the upper profile layers are found in the deep cores.
21 Concentrations of toxicants in the deep cores exceed
22 the 1 ppm limits set by EPA.
- 23 4. We have estimated that the respective toxicants ab-
24 sorbed by the soil had contributed to the equilibrium
25 concentration of toxicants in the ambient soil solution
26 (except for hexachlorocyclohexane) at levels that ex-
27 ceeds the EPA concentration limits for community and

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1 navigable waters by factors ranging from 1208 to 66,666
2 times.

3 5. Analysis of deep soil core samples indicate movement of
4 toxicants through the soil profile resulting in toxicant
5 concentrations from 15-85% of the upper soil profile.
6 These levels in the deep profile constitute a hazardous
7 level of toxicants and therefore induce adverse effects
8 on the quality of ground water and present a threat to
9 biological life and health.

10 6. The persistence of the respective high concentrations
11 of toxicants in soil of the Olin site exceeds the ex-
12 perimental half a life of the respective toxicants and
13 therefore the toxicants have continued to present a
14 hazardous waste in the soil and soil solution 10 years
15 after manufacturing operations had ceased. It is not
16 possible to make a definitive statement as to the
17 length of time these toxicants will remain at hazardous
18 levels in soil of the Olin site. It is suspected how-
19 ever because of the exceptional high levels of toxicants
20 in the soil, the lack of light and reduced level of
21 oxygen beneath the mantle which depresses the degradation
22 process, the toxicants will remain at hazardous levels
23 for an extended period, perhaps 15 years based on the
24 optimum conditions.

25 7. At the time of sampling, the amounts and concentrations
26 of the respective toxicants in the soil of the Olin site
27 exceeded the levels of identical toxicants in the check

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1 sites by a mean factor of 173 times. Since the check
2 sites are representative samples of the environment with
3 the same ecosystem as the Olin plant site, the large
4 toxicant concentration differences between sites is
5 indicative of previous abnormal adulteration of the soil
6 in the Olin site with the products produced during the
7 manufacturing activities at the Olin site.

- 8 8. Symap projections coupled with deep soil sample analysis
9 delineate the areal and depth limits of the soil con-
10 tamination in the Olin site.

24 C.B.I. CLAIM WAS WAIVED
25 - 40 C.F.R. §2.205(d)(1) -
26 - [J.L.T. (6C-H) Dec 83] -
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Section 6 - Appendix

6.1 Calculations employed to generate data for Tables 8-19 of the
Olin report.

6.2 Chemical analysis of soil samples from Houston site.

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Section 6.1 Calculations employed to generate data for Tables 8-19 of the Olin Report.

Table 8

1. Area of Olin site 8,580 acres, (373,750 sq. ft.).

2. Estimated volume of upper soil cores:

$$373,750 \text{ sq. ft.} \times 1 = 373,750 \text{ cu. ft.}$$

3. Wt. of soil volume: $373,750 \times 1.30$ (bulk density)

$$\times 60.2^{\#} (\text{cu. ft. water}) = 30,124,250^{\#}$$

4. Estimated pounds of respective toxicants in Olin site

based on Symap projections:

$$\sum \left(\begin{array}{l} \text{Number of occurrences} \\ \text{for each value No.} \div 2,166 \times 30,124,250 \div \\ 1 \times 10^6 \times \text{Midpoint concentration.} \end{array} \right)$$

5. Estimated pounds of respective toxicants in check sites

based on Symap projections:

$$\left(\begin{array}{l} 330 \text{ occurrences for} \\ \text{one value No.} \end{array} \right) \div 2,166 \times 30,124,250 \div 1 \times 10^6 \times \text{Mid-point Concentration}$$

Table 9 Estimated mean concentration of respective toxicants in soil of Olin and check site

$$\sum \left(\begin{array}{l} \text{Number of occurrences} \\ \text{for each value No.} \times \text{Midpoint conc.} \end{array} \right) \div 2,166$$

Table 10 Estimated percentage of sites contaminated with respective toxicants at concentrations exceeding 1 ppm - from Symap projections;

$$\left(\begin{array}{l} \text{Olin site} \\ \text{number of occurrence} \\ \text{for each value No.} > 1 \text{ ppm} \end{array} \right) \div > 1 \text{ ppm total occurrences}$$

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check site - single site

$$162 \times \text{Value No.} > 1 \text{ ppm} \div \text{Total occurrences} > 1 \text{ ppm}$$

check site - two sites

$$(\text{site 1}) + (\text{site 2}) \div 2$$

Table 11 Estimated mean areal distribution of concentrations of toxicants in Olin and check sites compared

$$\left(\begin{array}{l} \text{Number of occurrences of each} \\ \text{value No.} > \text{check values} \end{array} \right) \div \begin{array}{l} \text{total No. occurrences} \\ > \text{check values} \end{array}$$

$$\left(\begin{array}{l} \text{Number of occurrences of} \\ \text{each value No.} > \text{check value} \end{array} \times \begin{array}{l} \text{Midpoint} \\ \text{conc.} \end{array} \right) \div \begin{array}{l} \text{total of occurrences} \\ \text{check values} \end{array}$$

Table 12-18 Estimated concentrations of toxicants in ambient soil solutions of Olin and check sites. From Symap projections and K_{ow} coefficients for all toxicants at soil concentrations exceeding 1 ppm.

$$1. \log K_{oc} = 1.019 - K_{ow} - 0.18 \quad (\text{See Section 4.4})$$

K_{oc} = Equilibrium constant based on pesticide retention by organic matter in soil.

K_{ow} = Octanol/water partition coefficient for specific toxicant (from literature).

$$2. K_{oc} = \frac{\text{ug/g absorbed/g of organic carbon (O.C.)}}{\text{ug/ml of solution}}$$

3. Lake Charles Clay soil, upper profile, 2.5% O.M.

or $\frac{2.5}{2} = 1.4\%$ O.C. organic carbon
2 conversion factor

$$4. \frac{1.0g \text{ soil}}{.014} = .014g \text{ O.C./g soil}$$

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5. Equilibrium conc. of specific toxicant in solution for each value number exceeding 1.0 ppm becomes:

$$\text{ug/ml solution} = \frac{\text{ug/g soil}}{.014} / K_{oc}$$

6. Mean equilibrium concentration for specific toxicant:

$$\left(\frac{\text{ug/ml solution for each value No. } > 1 \text{ ppm} \times \text{No. of occurrences}}{\text{total No. of occurrences } > 1 \text{ ppm}} \right)$$

Table 19 Comparison of solution concentrations of respective toxicants and EPA limits.

$$\frac{\text{conc. in site}}{\text{EPA conc. limits}}$$

Persistence of select organochlorine insecticides in soil⁽¹⁾

Chemical	Half-life (years)	Time for ⁽²⁾ 95% disappearance (years)
Chlordane	1.0	4
DDT	2.8	10
Dieldrin	2.5	8
Toxaphene	0.8	3.5

(1) Data from: Edwards, C.A. 1981 In Persistent pesticides in the environment, 2nd Ed. CRC Press, Boca Raton, Florida.

(2) Data based on silt loam soil planted to annual crops and cultivated each year.

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Section 6.2

Chemical Analyses of Soil Samples
From Houston Study Site

Prepared for:
Pollution Assessors
Houston, Texas

By:
Dr. E. Atlas

In Consultation With:
Dr. C. S. Giam

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Note: The analyses and data interpretation presented in this report are the sole responsibility of the author. The report is based on many years of experience by the author as a Research Scientist in the field of Organic Analyses and on consultation with Dr. C. S. Giam, a recognized expert on Environmental Chemistry. Though the author is an employee of the Texas A&M Research Foundation, neither the Research Foundation nor the Texas A&M University System reviewed or endorses the contents of this report.

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PART I.

Non-Technical Summary

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Introduction

This report describes the results of chemical analyses of soil samples submitted by Dr. Eugene Brams of Pollution Assessors from a site in Houston, Texas.

The objective of the study was to determine the concentration of selected chlorinated hydrocarbons (e.g. pesticides) at the study site in Houston. Selected compounds include toxaphene and DDT (figure 1.), as well as HCB, HCH, chlordane and PCB.

Methods

Details of the methodology are presented in the technical section in part two of this report. Briefly, soil samples collected at the site were subsampled and stored frozen until analysis. The organic compounds were extracted from the soil using suitable organic solvents. Separation of the complex mixture of compounds in the extract was carried out by adsorption chromatography followed by capillary gas chromatography.

Results and Discussion

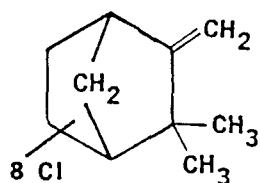
The data (Tables 1 - 4; Part II) show that several of the sites have relatively high levels of DDT and toxaphene, as well as hexachlorobenzene, hexachlorocyclohexane, chlordane, and polychlorobiphenyls. The highest concentrations were found at sites 2, 3, 6A, 10, 11, 13 and 17. The localized high concentrations of these chemicals at these sites is consistent with the suggestion that there had been previous industrial activity at the sites, e.g. manufacture, storage, spillage, etc., rather than general background levels of pollution.

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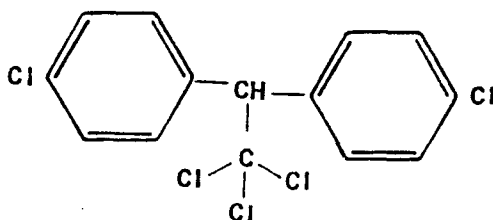
Figure 1.

Chemical Structure of Major Chlorinated Pesticides

Toxaphene



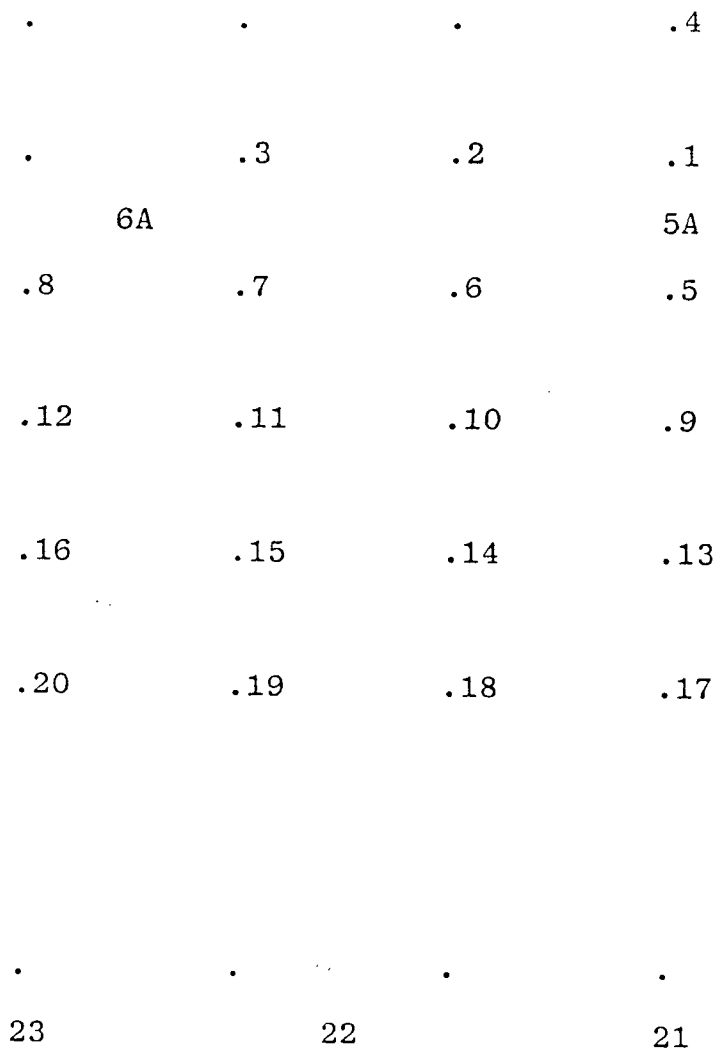
DDT



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Figure 2.

Approximate relative locations of sampled sites.



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PART II.

TECHNICAL SUMMARY

C.B.I. CLAIM WAS WAIVED
- 40 C.F.R. §2.205(d)(1) -
- [J.L.H. (6C-H) Dec 83] -
* * * * *

Technical Summary

Introduction

This section of the report will discuss in more detail the methods and results of analyses for the set of soil samples from the Houston study site.

Methods

1) Sampling. Sampling was performed by Brown and Associates using a coring technique. The core sections were sub-sampled using solvent-rinsed metal tools. The soil samples were placed in pre-fired ($>500^{\circ}\text{C}$) mason jars with aluminum lined caps and were kept frozen until analysis. This procedure minimized any background contamination from sample handling techniques.

2) Extraction. Approximately 50 gram (thawed) samples were weighed into 300 ml round-bottom flasks. Large clumps were physically broken-up using a clean spatula. The sample was refluxed over a steam bath in 100 ml of a 20% acetone: acetonitrile (v/v) mixture for two hours. After cooling, the sample was filtered and rinsed two times with 50 ml of acetonitrile. The filtrate was diluted with 700 ml of 5% NaCl. The diluted filtrate was extracted 3 times with 20% methylene chloride: petroleum ether and concentrated to ~25ml and dried with sodium sulfate in preparation for column chromatography.

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3) Column chromatography. Chromatographic separation was performed on a 13 g 1.25% deactivated Florisil column.

A 5-ml aliquot of sample extract was placed on the column and eluted with 50 ml petroleum ether (fraction 1) and 50 ml 5% diethyl ether: petroleum ether (v/v) (fraction 2).

These fractions were adjusted to appropriate volumes for subsequent gas chromatographic analysis.

4) Gas-chromatography. The samples were analyzed on a Hewlett-Packard 5880 gas chromatograph utilizing a ^{63}Ni electron capture detector. The column was a 30-m DB-1 fused silica column (0.25 mm i.d.), hydrogen was the carrier gas (28 psi). The injector and detector were operated at 225° and 325°C, respectively. The oven program was: 100°C (1 min.), 10°/min. to 130° (hold: 1 min.), 5°/min. to 270° (hold: 5 min.). Peak height, areas, and retention times were recorded and calculated with an electronic integrator. Authentic pesticide standards were used for calibration of the instrument.

Note:

The analytical methods described here were based on published procedures and also on protocols developed independently over many years by the Environmental Chemistry Group under the direction of Professor C. S. Giam, (see reference list). The basic methodology has been validated by numerous internal checks and external inter-laboratory comparisons. The analyses reported here were performed by or under the direct supervision of Dr. E. Atlas, a Senior Research Scientist, with Professor Giam's Group. It is emphasized that neither the Texas A&M Research Foundation nor the Texas A&M

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University System reviewed or endorsed the contents of this report. Appropriate literature citations are attached.

Results

The results of the analyses are given in Table 1-4. GC/MS analyses of selected samples confirmed the presence of toxaphene, DDT compounds and other chlorinated compounds in the samples. Additional confirmation was provided by alkaline hydrolysis of the sample extracts. Blanks analyzed along with the samples showed negligible background contamination. Chromatograms of blanks were routinely clean which demonstrated the cleanliness of the laboratory procedures used in this study. Furthermore, soil samples with only trace quantities of contaminants demonstrated that the sampling procedure did not introduce artifacts into the samples prior to analysis. For example, compare the chromatograms of site 15-1 (Fig. 3) and 2-1 (Fig. 4). Even though the extract from site 15 was concentrated over 5000 times more than that from site 2 only traces of compounds are seen in the chromatogram. Excellent recovery of toxaphene, DDT and other pesticides was found for spiked samples analyzed with the normal samples. Sample number designations were those supplied by Brown and Associates (1982). Relative positions (approximate) of the sample locations is given in Figure 2.

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Table 1.

Toxaphene concentration (ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>Toxaphene Concentration</u>
1-1	1080
2-1	701000
3-1	421000
3-2	342000
4-1	<5
5-1	95
5A-1	<7
6-1	<4
6A-1	71100
7-1	126
8-1	<6
9-1	<5
10-1	7000
11-1	3110
12-1	<4
13-1	27000
14-1	<2
15-1	<5
16-1	<7
17-1	13400
18-1	1560
19-1	<4
20-1	<4
21-1	<4
22-1	40
23-1	7
C1-1	164
C2-1	156

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Table 2.

Concentrations of DDT and metabolites (ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>DDE*</u>	<u>DDD*</u>	<u>DDT*</u>	<u>ΣDDT**</u>
1-1	105	453	248	806
2-1	8000	11100	69800	88900
3-1	17200	36700	22600	76500
3-2	427	17100	15600	33100
4-1	<1	<1	12	12
5-1	<1	<1	35	35
5A-1	1	<1	7	8
6-1	55	40	14	109
6A-1	309	30400	3326	33762
7-1	488	173	39	700
8-1	3	<1	63	66
9-1	19	9	9	37
10-1	1500	3	13600	15100
11-1	1470	1686	616	3769
12-1	<3	<1	9	9
13-1	21300	5930	3470	30700
14-1	783	12200	5100	18100
15-1	<2	<1	10	10
16-1	7	4	34	45
17-1	7104	402	5960	13500
18-1	390	419	1080	1880
19-1	9	24	8	41
20-1	<1	<1	5	5
21-1	4	4	11	19
22-1	79	127	7	206
23-1	12	3	46	61
C1-1	2	<1	688	690
C2-1	126	<1	24	150

* includes both o,p and p,p' isomers

**ΣDDT = DDE + DDD + DDT

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Table 3.

Concentrations of selected chlorinated hydrocarbon insecticides (ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>Hexachlorocyclohexane</u>	<u>Chlordane</u>	<u>Dieldrin</u>
1-1	3230	122	18
2-1	11100	10800	4260
3-1	5600	10700	2190
3-2	4180	3041	2471
4-1	166	1	<1
5-1	6	<1	<1
5A-1	55	1	<1
6-1	<1	3	<1
6A-1	2440	10690	814
7-1	12	65	<1
8-1	82	<1	<1
9-1	32	1	<1
10-1	147	485	310
11-1	120	765	36
12-1	<2	<1	<1
13-1	641	2430	1080
14-1	<2	474	185
15-1	5	<1	<1
16-1	7520	<1	<1
17-1	361	633	490
18-1	5	215	22
19-1	<2	6	2
20-1	<2	<1	<1
21-1	<2	1	<1
22-1	<2	56	31
23-1	<2	18	10
C1-1	2	10	20
C2-1	<2	<1	<1

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Table 4.

Concentration of chlorinated benzenes and chlorinated biphenyls (PCB)
(ug/kg) in soil samples from study site.

<u>Sample Designation</u>	<u>Pentachlorobenzene</u>	<u>Hexachlorobenzene</u>	<u>PCB*</u>
1-1	8	63	1
2-1	2560	70500	10700
3-1	2930	12400	41300
3-2	--	1680	2080
4-1	<1	<1	27
5-1	<1	<1	<1
5A-1	<1	7	<2
6-1	<1	<1	<2
6A-1	8	81	175
7-1	<1	34	8490
8-1	<1	<1	<1
9-1	<1	<1	<1
10-1	20	86	51
11-1	20	43	16800
12-1	<1	<2	4
13-1	183	212	176
14-1	53	153	2870
15-1	<1	<1	<1
16-1	5	<1	273
17-1	64	79	393
18-1	4	13	174
19-1	<1	1	<1
20-1	<1	<1	5
21-1	<1	<1	<1
22-1	3	<3	1170
23-1	<1	5	20
C1-1	<1	4	7
C2-1	<1	<2	2580

*Calculated as the sum of Aroclor 1254 and Aroclor 1260.

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Discussion

The soil samples from the study site contained a complex variety of chlorinated hydrocarbons contaminants with a concentration range of over five orders of magnitude. Also, there were often distinct differences in the gas chromatographic "fingerprint" from area to area throughout the study site. Some of these differences are illustrated in Figures 3 to 9. These figures are electron capture chromatograms of representative sample extracts and authentic standards. (Note: Because of the large concentration differences involved and to allow a better comparison of chromatograms, a numerical figure is provided with each chromatogram to indicate the relative degree of dilution of the sample extract. Thus, a small number indicates a relatively small sample dilution (e.g. figure 3); a large number (figure 4) indicates that the sample required considerable dilution because of high concentration of contaminants.) The electron capture detector is most sensitive to halogenated compounds and is fairly selective in its response to organic compounds. Other classes of compounds, such as polynuclear aromatic hydrocarbons, will not be measured with the electron capture technique. Thus, the analyses reported here do not reflect a comprehensive survey of all classes of organic contaminants potentially present in the soil samples. Furthermore, only those electron-capture compounds which could be identified with authentic standards are reported here.

Based on information from the gas chromatographic analyses, a brief summary is given for each sample site:

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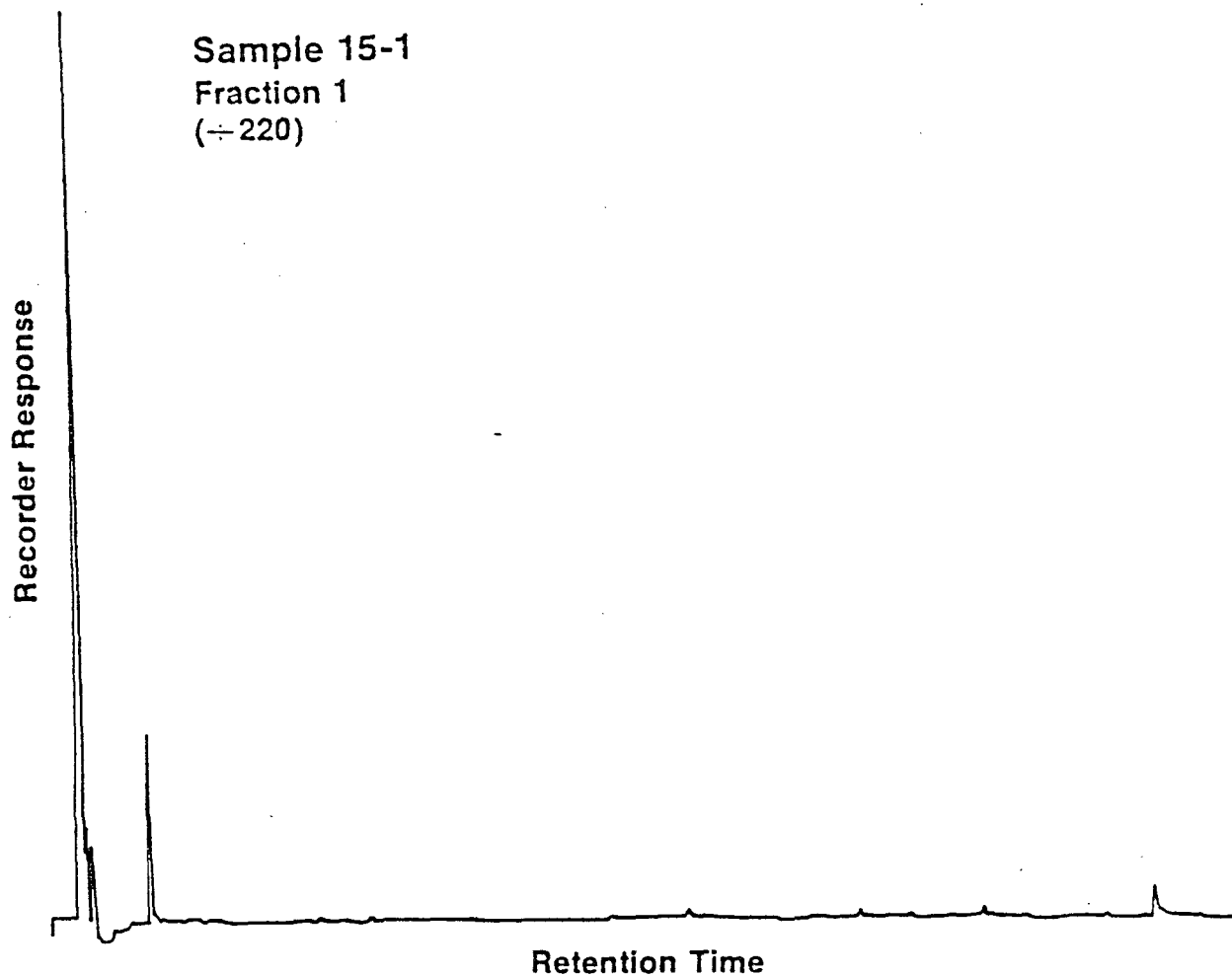


Figure 3.

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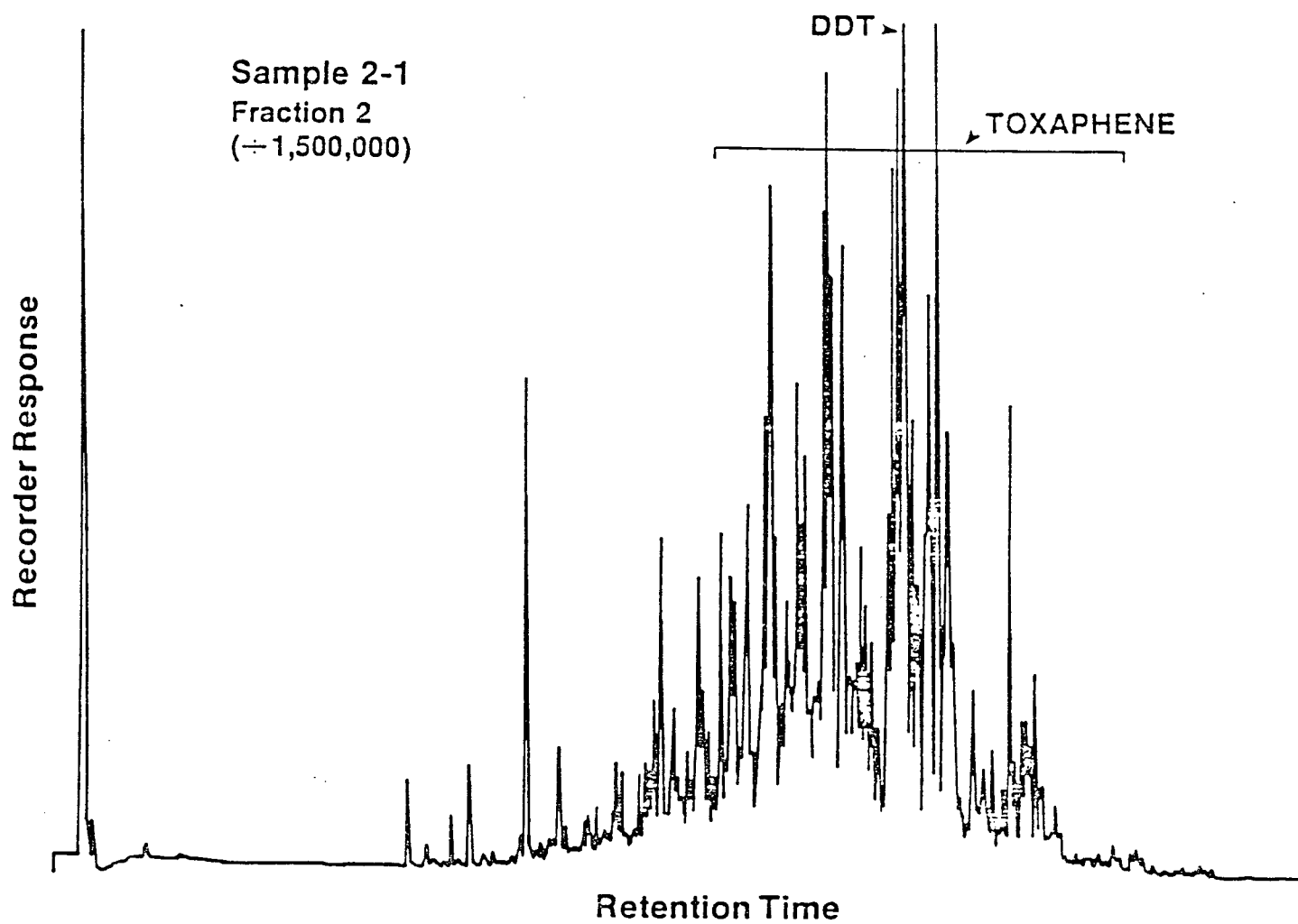
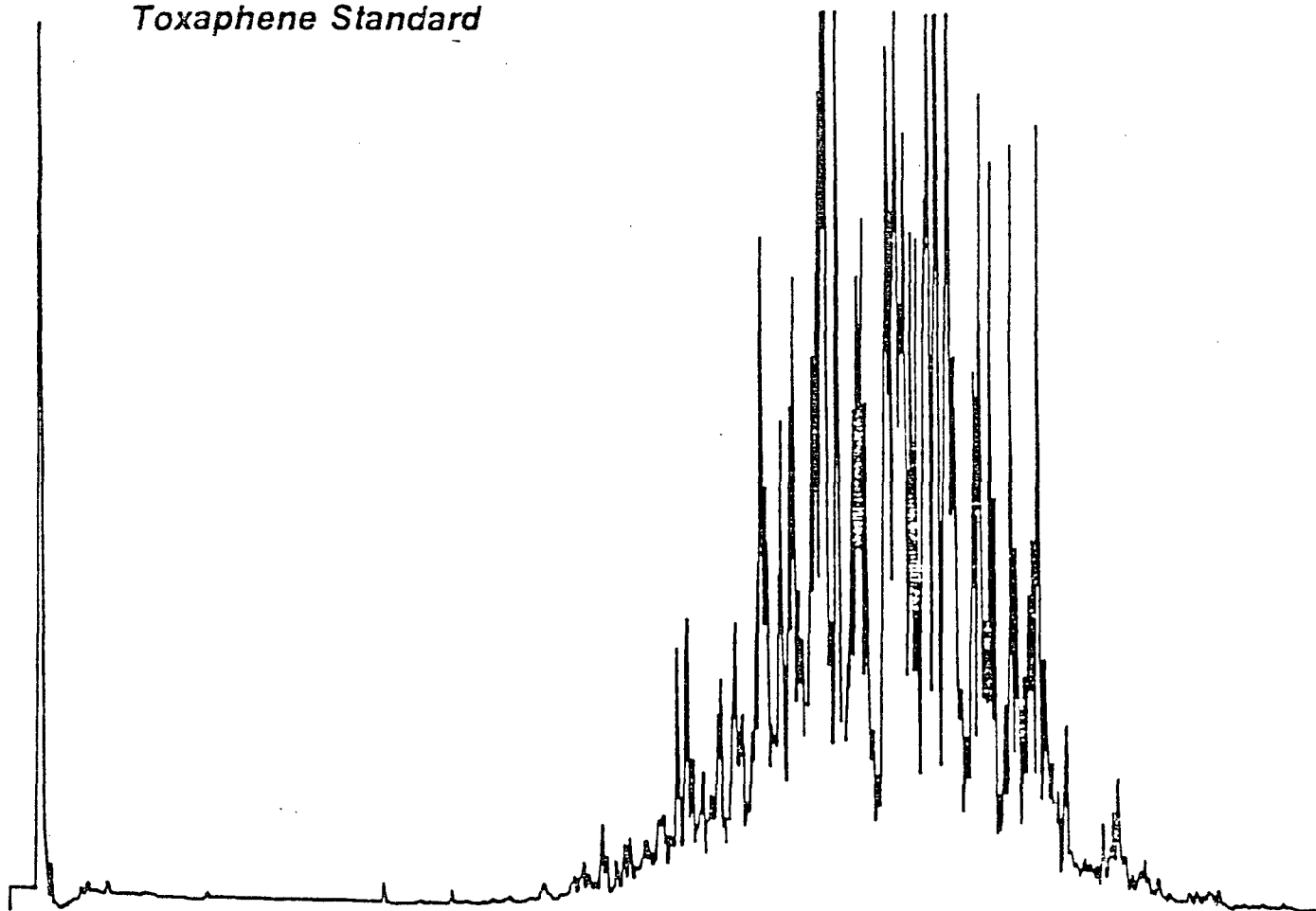


Figure 4

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Toxaphene StandardFigure 5**CONFIDENTIAL**

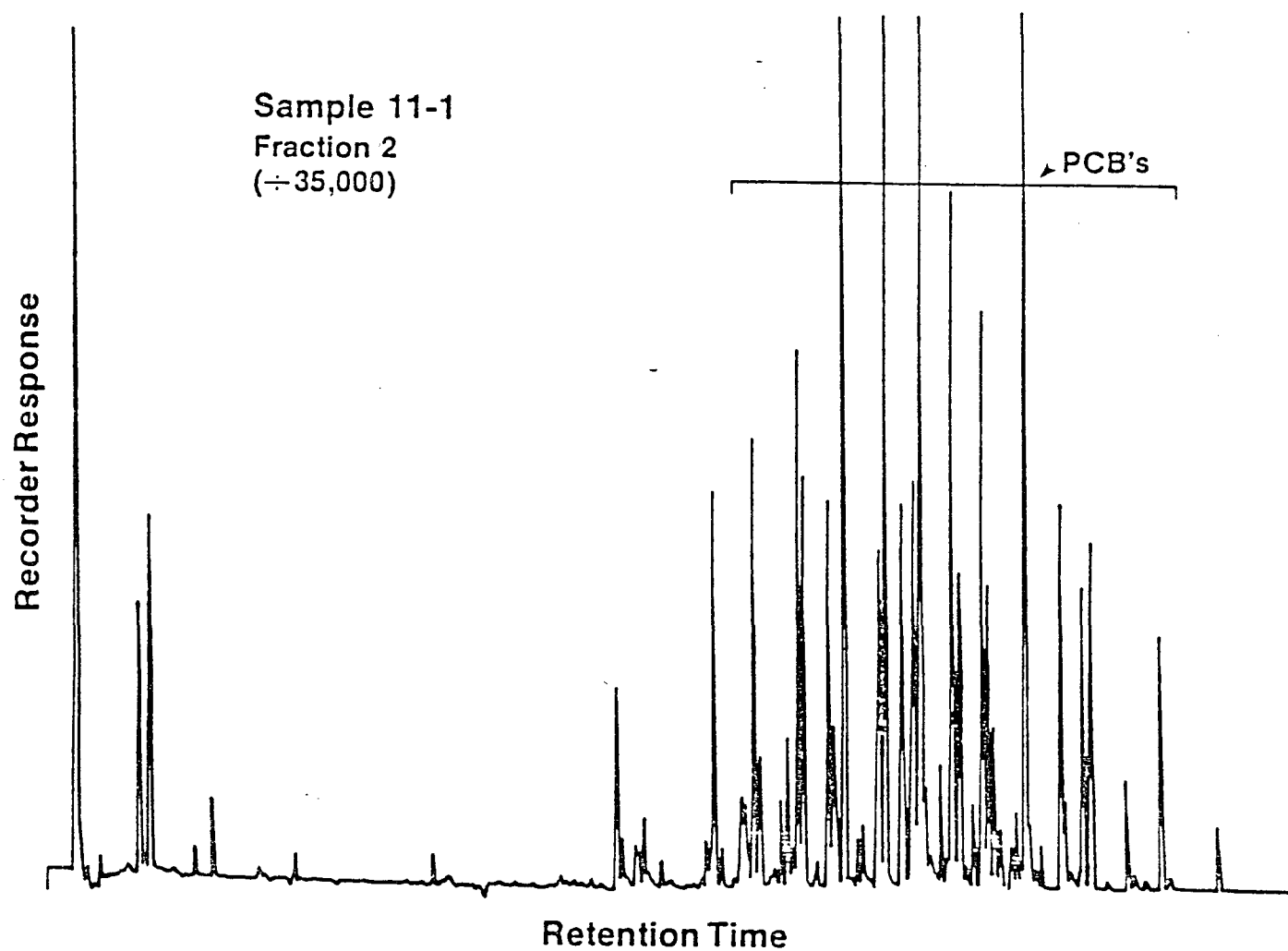


Figure 6

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Aroclor 1260 (PCB) Standard

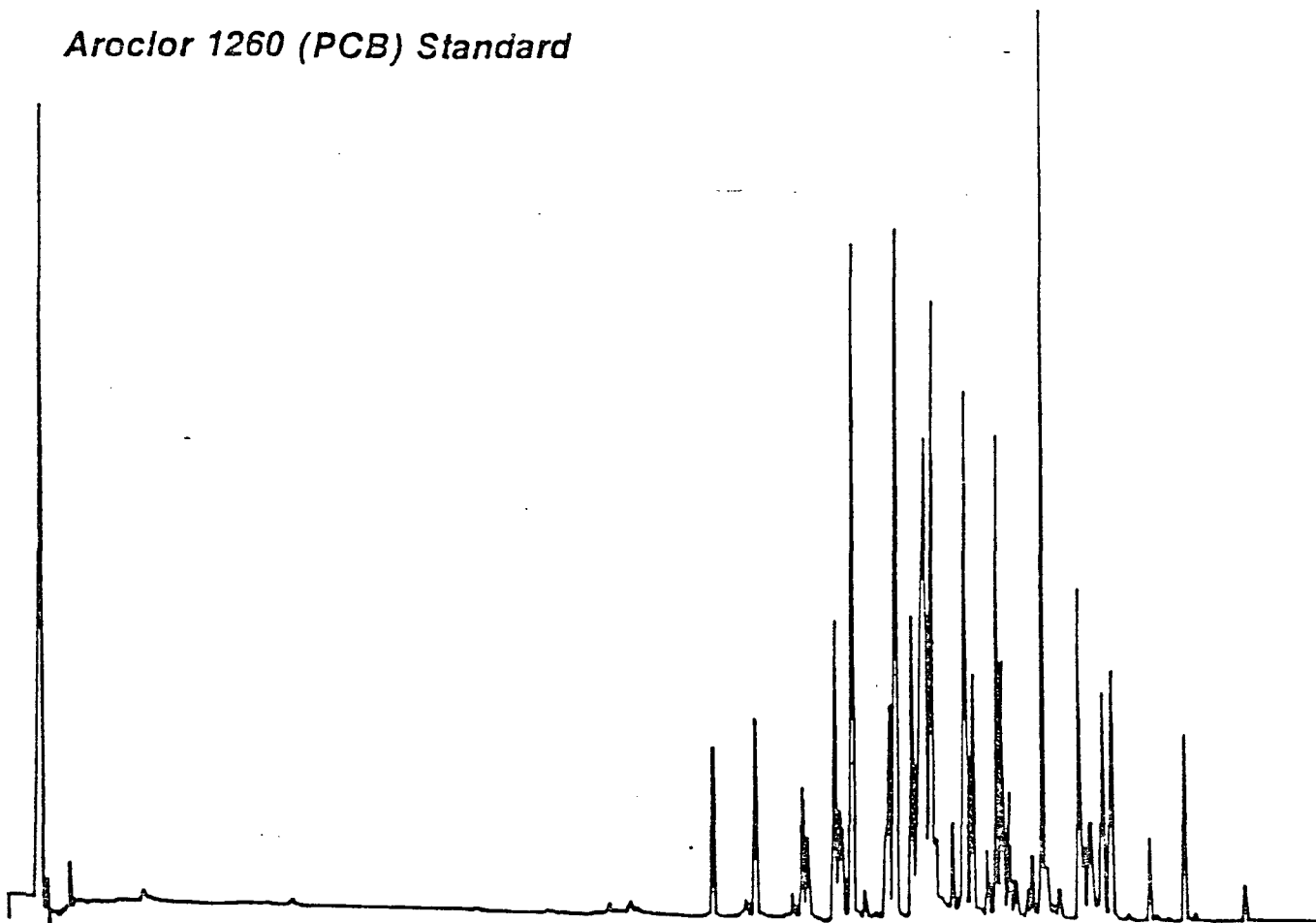


Figure 7

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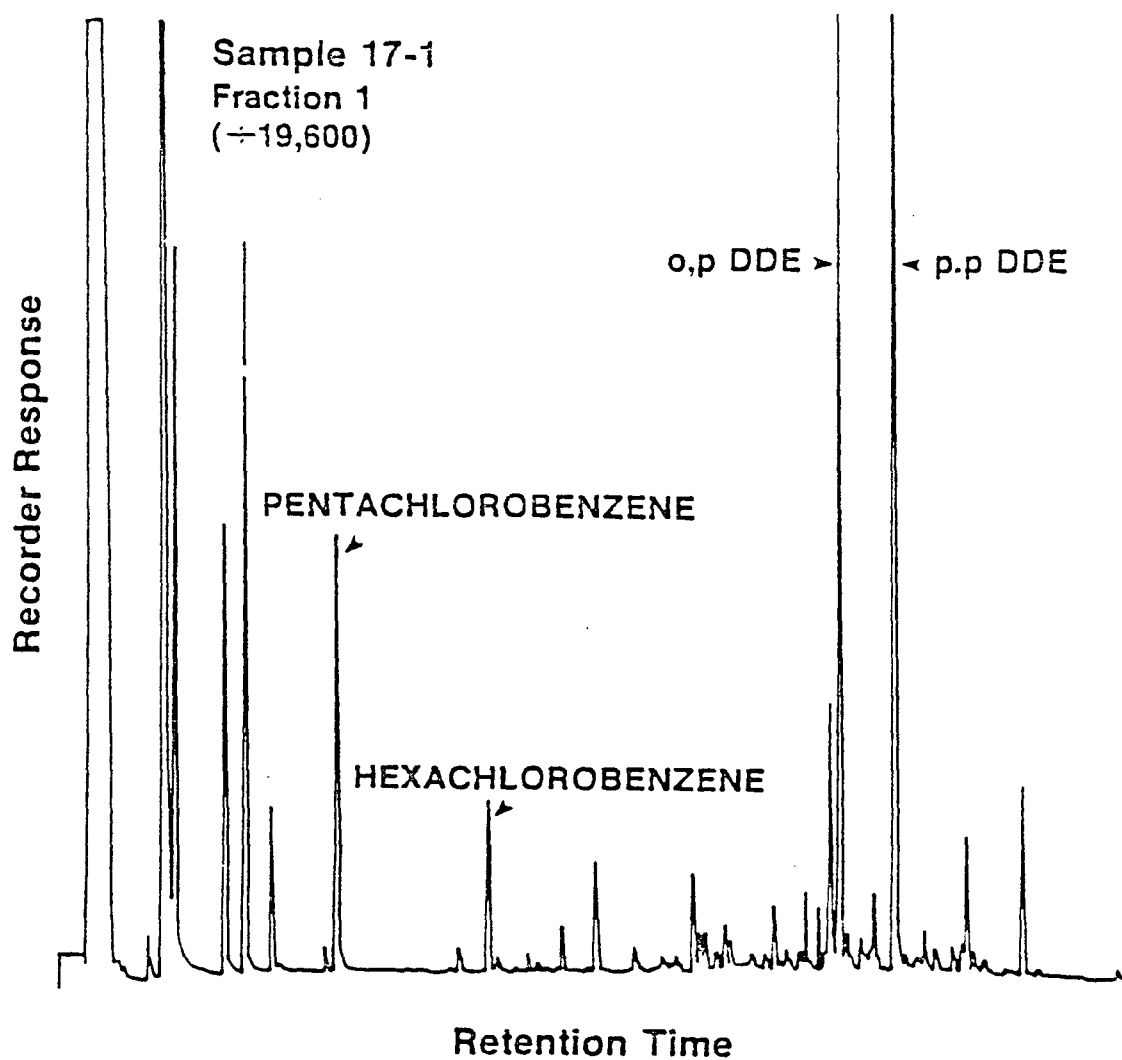


Figure 8

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Pesticide Standard Mixture

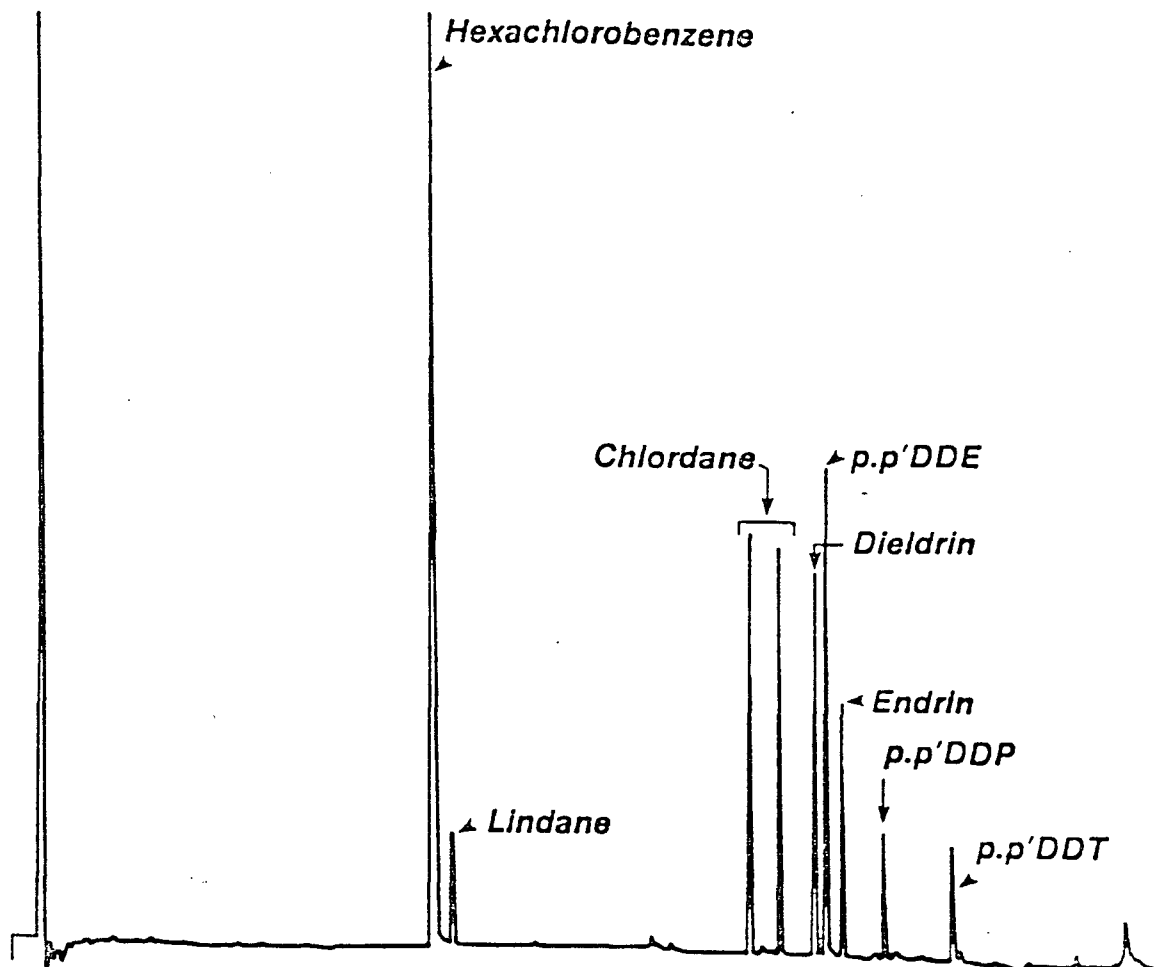


Figure 9

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- Site 1.) Moderate levels of contaminants; including some unidentified early eluting components. Unknown compound at 11.47 minute retention time (RT).
- Site 2.) Heavily contaminated with toxaphene, DDT's and other chlorinated compounds. Unknown at 11.47 minute RT.
- Site 3.) Both surface and deep samples show a high degree of contamination by toxaphene, DDT, and other compounds. Unknown at 11.47 minute RT.
- Site 4.) Relatively clean site; some hexachlorocyclohexanes (HCH).
- Site 5.) Relatively clean site. Unknown at 14.15 minute RT.
- Site 5A-1) Similar to Site 5.
- Site 6. Relatively clean site. Unknown at 14.15 minute and 14.15 minute RT.
- Site 6A-1) Relatively contaminated site; similar to Site 2, and 3. Unknown at 11.47 minute RT.
- Site 7.) High levels of PCB.
- Site 8.) Relatively clean site; some HCH.
- Site 9.) Similar to Site 8.
- Site 10.) Relatively contaminated by toxaphene and DDT. Unknown at 11.47 minute and 10.1 minute RT.
- Site 11.) High levels of PCB; otherwise similar to Site 10. Unknown at 11.47 minute RT.
- Site 12.) Relatively clean site.

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- Site 13.) DDT and toxaphene contamination; other components relatively high. Unknown at 11.47 minute RT.
- Site 14.) Mostly DDT contamination. Unknown at 11.47 minute RT.
- Site 15.) Relatively clean site.
- Site 16.) Relatively high levels of HCH; some unidentified early eluting compounds.
- Site 17.) Moderately high contamination by DDT, toxaphene and other compounds. Unknown at 10.08 minute and 11.47 minute RT.
- Site 18.) Moderate contamination by DDT and toxaphene. Unknown at 11.47 minute RT.
- Site 19.) Relatively clean site. Unknown at 11.47 minute RT.
- Site 20.) Relatively clean site. Unknown at 14.1 minute RT.
- Site 21.) Relatively clean site.
- Site 22.) Some PCB contamination; otherwise relatively clean site.
- Site 23.) Relatively clean site.
- Control) Control sites C1 and C2 are relatively clean sites, though C2 shows moderate contamination by PCB.

In general, the area most contaminated with toxaphene and DDT is found in the northern section of the study site (Samples 1, 2, 3, 6A). A second area of contaminated soil is located on the eastern edge of the site around sample areas 13 and 17. Also, high levels of PCB are located in the adjacent sites 7 and 11.

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The samples contaminated with toxaphene and DDT are, in general, three to five orders of magnitude higher than other samples within the study area and compared to the control site. These very high localized concentrations of chlorinated compounds are consistent with the suggestion that their source is from prior industrial activity, e.g. manufacture, use, spillage, etc., at specific locations on the site rather than from generalized pollution from the surrounding area.

One other notable feature of the soil extracts was the common appearance of an unidentified peak at 11.47 minutes retention time. The general occurrence (not-quantitative) of this compound is mapped in figure 10. It was a major peak in some of the gas chromatograms. Preliminary tests identify the compound as a chlorinated compound, but its identity cannot be established without further testing.

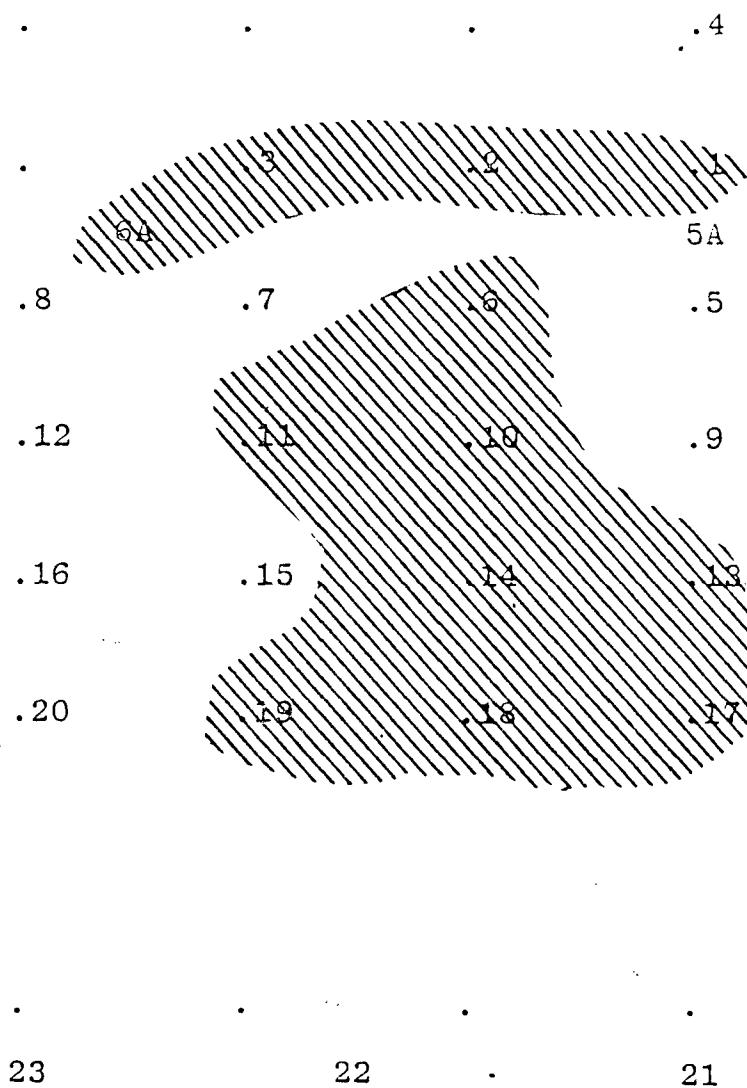
The distribution of this compound is similar to the areas of high concentration of toxaphene (figure 11).

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Figure 10.

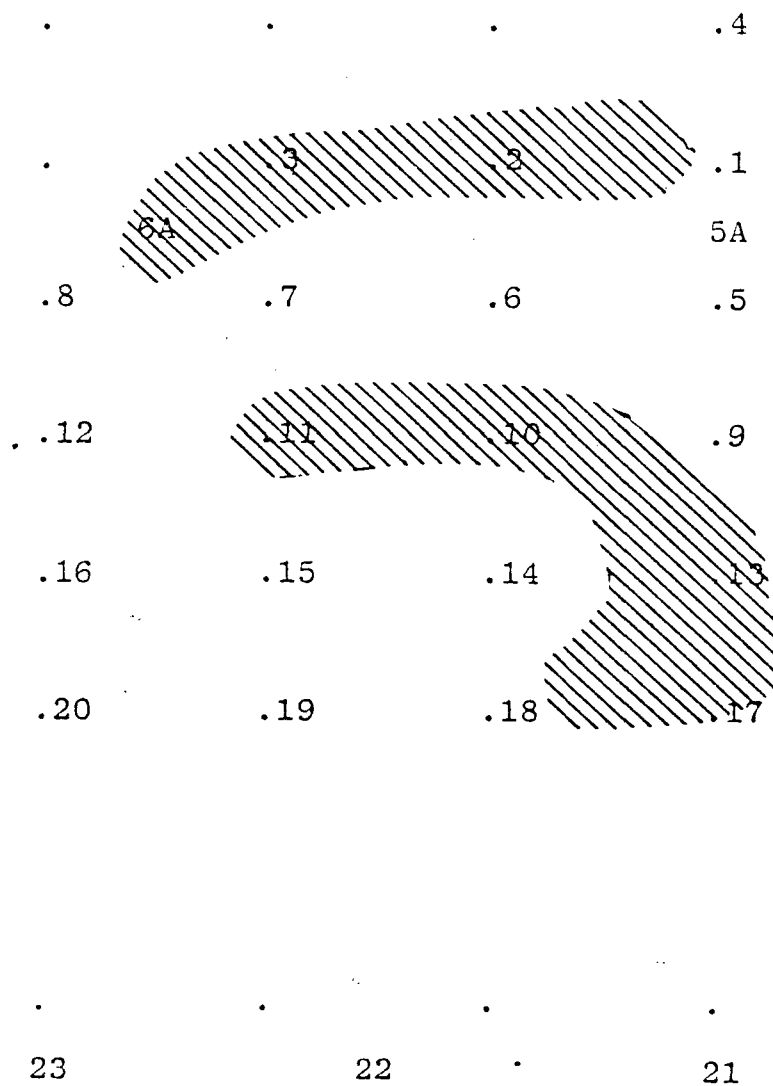
General distribution of unknown chlorinated compound (RT=11.47)



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Figure 11.

General distribution of high toxaphene concentrations in soil.



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ADDENDUM:COMPARISON OF SURFACE AND DEEP SOIL SAMPLES:Introduction

Chemical analysis of soil from two depths of the same core sample (#3) revealed high concentrations of toxaphene in the deep (2-4') soil layers compared to the surface (0-2') layer. The deep section contained approximately 80% of the concentration of toxaphene measured in the top layer. Pollution Assessors, Inc. has requested examination of additional deep soil samples to determine the extent of penetration of chemicals at other sites in the study area. The samples chosen for re-examination are listed below: (See Figure 2 for locations.)

<u>Sample Designation</u>	<u>Approximate Depth in Core</u>
2-1	0-2'
2-2	2-4'
2-3	4-5'
2-4	5-7'
6A-1	0-2'
6A-2	2-4'
13-1	0-2'
13-2	2-4'
17-1	0-2'
17-2	2-4'
20-1	0-2'
20-2	2-4'

Analysis

For the purposes of the comparison, 1 g soil samples were extracted with methanol and petroleum ether and the resultant extract was analyzed by fused silica capillary gas chromatography using electron capture detectors (identical to analyses described earlier). As in the earlier detailed analyses, the main components of the extracts were toxaphene, DDT components and the unknown compound at retention time of 11.5 minutes.

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Results and Discussion

To examine the extent of penetration of chemicals into the deep samples, total integrated peak areas from the chromatograms of the surface and deep sample were compared for each soil core. Because of the predominance of toxaphene components in the soil extracts, this comparison is basically a comparison of the relative toxaphene concentrations in the surface and deeper samples. (See Table A1). The results are shown in Figures A1 and in Table A2.

Table A1

Comparison of surface toxaphene concentrations (Table 1) determined on 50g sub-samples and total integrated peak areas measured on 1g sub-samples (areas and concentrations normalized to site 6A-1).

<u>Sample Designation</u>	<u>Relative Peak Areas</u>	<u>Relative Toxaphene Concentration</u>
2-1	12.3	9.9
6A-1	1.0	1.0
13-1	0.35	0.38
17-1	0.19	0.19
20-1	b.d.*	b.d.*

*b.d. = below detection

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Table A2

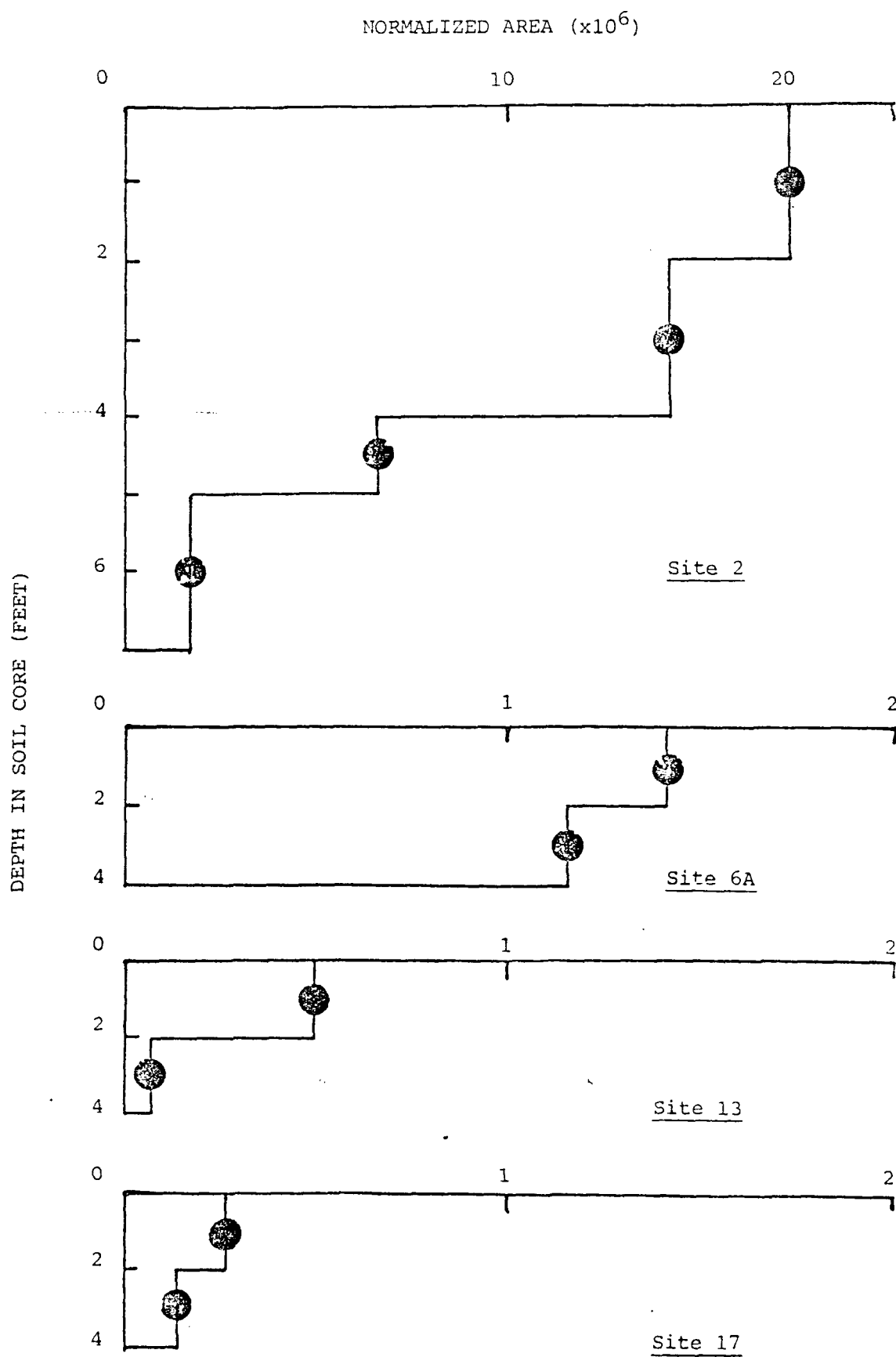
Relative concentration of chlorinated chemicals* of surface and deep soil samples.

<u>Sample</u>	<u>Depth</u>	<u>Total** Area x10⁶</u>	<u>% of Surface</u>
2.1	0-2'	17.5	100
2.2	2-4'	14.2	81
2-3	4-5'	6.6	38
2-4	5-7'	1.67	9
6A-1	0-2'	1.42	100
-2	2-4'	1.16	82
13-1	0-2'	0.50	100
-2	2-4'	0.08	15
17-1	0-2'	0.28	100
-2	2-4'	0.14	50
20-1	0-2'	<.001	-
-2	2-4'	<.001	-

*Electron capture sensitive components (primarily toxaphene).

**Normalized to lg soil; 1 μ l injection/10 ml sample extract.

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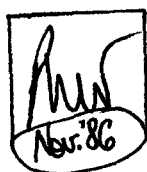
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The data here shows that at any given site there is measurable and significant penetration of toxaphene and other chemical compounds below the 0-2' surface soil layers. A range of 15- 82% of the compounds in the surface layer are found in the adjacent 2-4' depth zone in the soil core. Deeper soil samples at site 2 (up to 7') show generally decreasing levels of chlorinated compounds with increasing depth in the soil core.

As was found in the detailed analyses of the surface soil samples, site #2 contains the highest concentration of chemical contaminants compared to the other sites tested. In fact, the deep sample (5-7') at site #2 showed a comparable or greater level of contamination compared to the other surface samples tested. The clean surface and subsurface soil samples at site #20 demonstrated that there was not significant subsurface mobilization of chemical contaminants to the southwest quadrant of the study site, at least above the 4' soil level.

SUMMARY:

Sub-surface soil samples (2-4') at the Houston study site showed a significant fraction of the chemical compounds found in the surface layer. The range was from 15-82%.



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